

# **Gender based violence**

## The needs of migrant women

October 2022



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# **Gender based violence**

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# About the Committee

The Committee was established on 23 June 2021. Its remit can be found at:  
[www.senedd.wales/SeneddEquality](http://www.senedd.wales/SeneddEquality)

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Current Committee membership:



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Welsh Labour



**Jane Dodds MS**  
Welsh Liberal Democrats



**Altaf Hussain MS**  
Welsh Conservatives



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## Chair's foreword

All women in Wales should have readily available access to support when faced with violence and abuse, in whatever form it takes.

Migrant women face additional challenges, and can easily fall through the gaps in strategies designed to support women experiencing abuse. Too often they find themselves isolated in a seemingly hostile environment, away from family and support networks, exacerbated by the restraints of UK immigration laws.

During our inquiry we heard about the obstacles presented by language, the impact of certain cultural norms and the risk of immigration abuse, as well as the barriers faced by those with No Recourse to Public Funds.

We heard loud and clear the importance of working with communities; and listening to the survivor voice to improve awareness-raising and prevention strategies. We heard anecdotal evidence that victims hesitate to seek help due to fears about how frontline services will handle their cases. Specialist support services for these women play a vital role in their care and rehabilitation but are frequently under resourced and overwhelmed.

We were fortunate to be able to meet survivors and hear first-hand their harrowing stories. We were incredibly grateful to those we met for giving us their time and for sharing their experiences with us. This was vital in shaping our approach and broadening our understanding of the issues, and it reinforced our view that the voice of survivors is crucial.

Our recommendations to the Welsh Government aim to provide clarity to all, including the victims and survivors, and the services providing support as well as policy makers. The Welsh Government has signalled its commitment to finding solutions to the challenges faced by women with No Recourse to Public Funds. We believe its Strategy for Violence Against Women, Domestic Abuse and Sexual Violence needs a more targeted, tailored approach to supporting these groups of women which must take into account their specific needs and challenges.

### **Jenny Rathbone MS**

Chair of the Equality and Social Justice Committee

## Recommendations

**Recommendation 1.** The Welsh Government should set out how it intends to address the problems highlighted around language and interpretation provision to migrant women. This must include outlining the steps it will take to prevent statutory agencies using family members and / or Bawso as interpreters, unless in urgent or emergency cases. To support agencies in that regard, the Welsh Government should also consider creating a directory of recognised interpreters. .... Page 17

**Recommendation 2.** The Welsh Government should engage survivors of sexual and gender-based violence from migrant communities and other stakeholders such as local authorities, in the development of a community strategy on awareness raising and prevention, which can form guidance to statutory bodies..... Page 22

**Recommendation 3.** The Welsh Government should establish a crisis fund that service providers can access to support migrant women who are victims or survivors of Sexual and Gender Based Violence and are subject to No Recourse to Public Funds, using the Scottish Government’s ‘Ending Destitution Together’ strategy as an example. We expect this work be carried out within the next six months with a view to establishing a fund by July 2023. .... Page 27

**Recommendation 4.** The Welsh Government should publish annual updates on its No Recourse to Public Funds work, including the work of the NRPF steering group; progress with options for supporting migrant women with NRPF being considered, and discussions with the UK Government..... Page 27

**Recommendation 5.** The Welsh Government should undertake a review of implementation of the Social Services and Well-being (Wales) Act 2014 to see what impact it has had on migrant women with No Recourse to Public Funds and their children. The review should be carried out within the next six months and should explore ways of ensuring the Act is implemented consistently across Wales..... Page 30

**Recommendation 6.** The review should include an evaluation of the guidance provided to local authorities on implementation of the Social Services and Well-being (Wales) Act and its role in supporting migrant women and children with No Recourse to Public Funds, to ensure that it is fully reflective of the legal position. This evaluation should also consider options for effective roll out of revised guidance to ensure that it is consistently understood across Wales. .... Page 30

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- Recommendation 7.** The Welsh Government should set out how it intends to work with the UK Government to respond to concerns around provision of legal advice on immigration status for migrant women in Wales. .... Page 33
- Recommendation 8.** The Welsh Government should consider how it can ensure access to good quality legal advice by working with stakeholders to look at models of best practice including JustRight Scotland and report back to this Committee by July 2023 ..... Page 33
- Recommendation 9.** The Welsh Government should set out guidance for training on specific issues related to migrant women which can be embedded into regular training across Wales, to improve understanding and to tackle any potentially discriminatory behaviour exhibited by frontline services. This guidance should be published by July 2023. .... Page 36
- Recommendation 10.** The Welsh Government should use the new data available through the Equality, Race and Disability Evidence Units to establish baselines to inform future monitoring and targeting of advice and services. This work should be carried out within the next six months. .... Page 39
- Recommendation 11.** The Welsh Government should set out how it plans to ensure that when collecting data on migrant women, they have a clear understanding of what is happening with their data, and how it will inform future decision-making. .... Page 39
- Recommendation 12.** The Welsh Government, in partnership with the Police and local authorities, should take steps through guidance to address concerns about the relationship between data sharing and survivors’ willingness to seek support. This guidance should be shared widely with specialist organisations, community groups and the wider public and should be made available in different languages. .... Page 42
- Recommendation 13.** The Welsh Government should establish a firewall which restricts the sharing of data between agencies on those who seek support for Sexual and Gender Based Violence. .... Page 43
- Recommendation 14.** The Welsh Government should include the Welsh Refugee Council on its National Partnership Board. .... Page 46
- Recommendation 15.** The Welsh Government should amend its Strategy on Violence against Women, Domestic Abuse and Sexual Violence for 2022-26 to include a section which deals specifically with the needs of migrant women and children and those subject to the No Recourse to Public Funds. .... Page 46
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## 1. Introduction

Violence against women and girls disproportionately affects migrant women. They can face multiple forms of abuse including domestic violence, sexual violence, ‘honour-based’ violence, forced marriage, Female Genital Mutilation and trafficking.

### Background

**1.** On 14 March 2022 the Equality and Social Justice Committee (the Committee) held a roundtable discussion with key stakeholders in order to inform its approach to work on gender-based violence and abuse.<sup>1</sup> Migrant women were highlighted as a key neglected group, whose needs are not being properly met.

**2.** The Committee established this inquiry to consider the specific barriers faced by migrant women when trying to access services and what the Welsh Government could do to ensure migrant women are able to access services which are fully resourced to deal with a range of cultural norms and practices. **Full details regarding the background to the inquiry, including the terms of reference, are available on the inquiry homepage.**

### Evidence gathering

**3.** The Committee gathered evidence through a public consultation, oral evidence sessions and focus groups organised by the Senedd’s Citizen Engagement Team.

**4.** The Minister for Social Justice (the Minister), the Minister for Health and Social Services (the Health Minister) and the Deputy Minister for Social Services (the Deputy Minister) gave evidence on 27 June 2022.<sup>2</sup>

**5.** Further details are available in the Engagement Summary<sup>3</sup>. See the Annex for a list of the evidence gathered.

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<sup>1</sup> [Equality and Social Justice Committee, 14 March 2022](#)

<sup>2</sup> [Equality and Social Justice Committee, 27 June 2022](#)

<sup>3</sup> [Summary of engagement](#)

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**6.** The Committee would like to thank all those who contributed to this inquiry. In particular the Committee wishes to pay tribute to the migrant women with lived experience of sexual and gender-based violence who shared their harrowing testimonies with us courageously, and with such honesty.

If you or someone you know are affected by any of the issues dealt with in this report, there are a number of organisations that can provide you with free and impartial advice:

- **Bawso**: 0800 7318147
- Live Fear Free helpline: 0808 80 10 800
- **Welsh Refugee Council**: 0808 196 7273

## Policy background

**7.** Women with an insecure immigration status, or whose migration status is dependent on a spouse or employer, are often at a heightened risk of violence and exploitation. These women have come to the UK in different ways, including:

- on a visa which gives them leave to remain without recourse to public funds;
- as a refugee seeking asylum;
- on a visa connected to their spouse;
- as a victim of trafficking; and
- on a time-limited visa (student or work visa) which has expired.

**8.** Immigration is a reserved policy area and comes under the responsibilities of Westminster and the UK Government. However, there are a number of devolved responsibilities and services involved in working with migrant women.

**9.** One of the key policies impacting on this field of work is No Recourse to Public Funds (NRPF). Under Section 115 of the *Immigration and Asylum Act 1999*, a person will have 'no recourse to public funds' if they are 'subject to immigration control'. This means they have no entitlement to the majority of welfare benefits, including income support, housing benefit and a range of allowances and tax credits. This status can mean that women who are subject to NRPF are unable to access services including specialist-supported accommodation.

**10.** Victims of Sexual and Gender Based Violence (SGBV) who are restricted by NRPF are not entitled to housing benefit to cover a place in a refuge, which can cost between £300-£400 per week; or unable to cover costs e.g. rent where a perpetrator has been removed from the home.

**11.** Research confirms that migrant women are more likely than men to be on a spouse visa and therefore depend on their husband for their immigration status.<sup>4</sup> This can make them particularly vulnerable to domestic violence, as it reduces their ability to leave an abusive partner.

**12.** The Domestic Violence (DV) Rule in 2002 enabled victims and survivors of domestic abuse on spousal visas to apply for indefinite leave to remain in circumstances where their relationship has broken down due to domestic violence.<sup>5</sup> The Destitution Domestic Violence Concession (DDVC) introduced in 2012 entitled DV Rule applicants to three months' temporary leave and the right to access limited state benefits and temporary housing.<sup>6</sup> The DDVC only applies to those who are destitute, which it defines as having no access to funds or being reliant on a third party to pay for essential living costs, such as basic accommodation and food.

**13.** A woman who meets the DDVC criteria may experience delay in obtaining a place in a refuge until their application has been approved by the Home Office. Additionally, many women will need to stay in a refuge beyond the three months.

### **Impact of these Changes**

**14.** The DV rule and DDVC do not extend to migrant victims and survivors with non-spousal visas.

**15.** In 2013, the Wales Migration Partnership (WMP) and Cardiff University published *Uncharted Territory*, a report investigating violence against women and girls from asylum-seeker, refugee and migrant communities in Wales.<sup>7</sup> The report identified how women and girls facing extreme violence and exploitation are either too afraid to report the violence, cannot access a women's refuge because of their immigration status, or are unaware of what support is available to them. It found that many asylum-seeking, refugee and migrant women and girls face specific barriers to accessing support, some of which stem from their communities and

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<sup>4</sup> The Joint Council for the Welfare of Immigrants, [We Are Here: routes to regularisation for the UK's undocumented population](#), April 2021

<sup>5</sup> Home Office, [Victims of domestic violence and abuse](#), November 2021

<sup>6</sup> Home Office, [Destitute domestic violence \(DDV\) concession](#), February 2018

<sup>7</sup> Wales Migration Partnership and Cardiff University, [Uncharted Territory](#), November 2013

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cultural pressures, but also because many migrant women do not have access to public funds and so face the stark choice of becoming destitute or staying with their abuser.

**16.** The Uncharted Territory report was reviewed by the Adverse Childhood Experience Support Hub Cymru with funding from Public Health Wales (PHW) in 2021. It found that there had been “some real progress made in terms of legislation in both Welsh and UK governments’ jurisdictions and policy, guidance and process that had addressed many aspects of the Uncharted Territory’s recommendations.”<sup>8</sup> However the review noted that some challenges remained, in particular the issues faced by those with NRPF.

**17.** On 24 May 2022 the Institute for Research into Super Diversity, University of Birmingham published the findings of a study on SGBV and forced migration in Wales. The SEREDA (Sexual and gender-based violence in the refugee crisis: from displacement to arrival) report concluded that, while there was “a dearth of services that could address the needs of minoritised individuals experiencing SGBV”, the devolved powers of the Welsh Government present “opportunities for investment in SGBV services for forced migrants, including those who are undocumented”.<sup>9</sup>

## Welsh Government strategies

**18.** The Welsh Government has produced a number of frameworks to support good practice when working with migrant women and girls who have been impacted by SGBV.

**19.** In line with the *Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015*<sup>10</sup> (the 2015 Act) the Welsh Government published its first National Strategy on Violence against Women, Domestic Abuse and Sexual Violence 2016-21.<sup>11</sup> It recognised the importance of considering the impact of SGBV on migrant communities, including how they are disproportionately affected by forms of abuse, and the barriers that exist to accessing support.

**20.** The Welsh Government consulted on a new draft for 2022-26 at the end of 2021. The new Strategy was published in May 2022.<sup>12</sup>

**21.** The 2015 Act stipulates that the Welsh Government must appoint a National Adviser for Violence Against Women, Gender-based Violence, Domestic Abuse and Sexual Violence to

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<sup>8</sup> [Uncharted Territory Review, August 2021](#)

<sup>9</sup> [Forced migration and sexual and gender-based violence: findings from the SEREDA project in Wales](#), May 2022

<sup>10</sup> [Violence against Women, Domestic Abuse and Sexual Violence \(Wales\) Act 2015](#)

<sup>11</sup> Welsh Government, [National Strategy on Violence against Women, Domestic Abuse and Sexual Violence 2016-21](#), November 2016

<sup>12</sup> Welsh Government, [Violence against women, domestic abuse and sexual violence: strategy 2022 to 2026](#), May 2022

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work alongside Ministers in tackling VAWDASV. In July 2022, the Welsh Government announced the re-appointment of Yasmin Khan and the appointment of Johanna Robinson, on a job-share basis.<sup>13</sup>

**22.** In addition to the VAWDASV Strategy, there are several other plans which include actions related to SGBV, including the Nation of Sanctuary<sup>14</sup> and the Anti-racist Wales Action Plan<sup>15</sup>.

### **Provision of services in Wales**

**23.** VAWDASV services are resourced from a mix of devolved and non-devolved budgets, grants and charitable donations with varied levels and length of funding. The Welsh Government funds VAWDASV services under different programmes, including refuge accommodation via the Supporting People Programme, the regional Domestic Abuse Services Grants as well as directly funding local authorities to commission other services for victims and survivors.

**24.** Specialist services are often best placed to support the specific needs of migrant women. Specialist services, or 'by and for' services<sup>16</sup>, are often the only place that victims with NRPF can turn to when in need of support, with many providing refuge and other forms of accommodation-based support through non-statutory funding.

**25.** In Wales, Bawso is the leading specialist organisation providing support to migrant women who have experienced SGBV. Its services are provided across Wales and include purpose-built refuges, safe-houses, one-stop-shop facilities, floating support for survivors in the community, and specialist projects to address violence and exploitation of women and girls, men and boys.

**26.** The Welsh Government has produced VAWDASV commissioning guidance which recognises that many specialist services are provided by small third sector organisations and therefore there is a risk within regional commissioning approaches that such providers can be disadvantaged by large scale procurement exercises. The guidance states that commissioning should be based on the principle that "no survivor is turned away from accessing critical support services".<sup>17</sup>

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<sup>13</sup> Welsh Government, [Written Statement](#), July 2022

<sup>14</sup> Welsh Government, [Nation of Sanctuary – Refugee and Asylum Seeker Plan](#), January 2019

<sup>15</sup> Welsh Government, [Anti-racist Wales Action Plan](#), June 2022

<sup>16</sup> Specialist 'by and for' services are organisations that are designed and delivered by and for people who are minoritised (including race, disability, sexual orientation, transgender identity, religion, or age). These services will be rooted in the communities that they serve and may include wrap-around holistic recovery and support that address a victim / survivor's full range of needs, beyond purely domestic abuse support.

<sup>17</sup> Welsh Government, [Statutory Guidance for the Commissioning of VAWDASV Services in Wales](#), May 2019

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## 2. Main challenges faced by migrant women

**27.** The main challenges faced by migrant women are: language and communication barriers; cultural norms and/or perceptions of VAWDASV; and their insecure immigration status.

### Language and communication

**28.** Language difficulties were identified by the majority of witnesses including representatives of Bawso, the Step Up Migrant Women coalition, and the Southall Black Sisters as one of the main barriers for women in terms of awareness, prevention and access to services.

**29.** Participants in our focus groups explained the difficulties that can arise when a migrant woman with a language barrier wishes to report an incident of VAWDASV. If an interpreter is required, caution has to be exercised if the interpreter is related to the individual or is a member of their community; risks include breaches of confidentiality and/or misrepresentation, whether intentional or otherwise.

**30.** Joanne Hopkins of PHW said the “outstanding challenge... is the barrier of language”. She noted that access to good quality translation is a key requirement when accessing support<sup>18</sup>. She argued that people need to be empowered through choice, for instance if they want a female interpreter, someone from their own community, or a particular dialect; how the meaning of a message is communicated (as opposed to the literal translation) is also important.

**31.** Naomi Alleyne from the Welsh Local Government Association (WLGA) said one of the difficulties “is making sure that you have enough interpreters that can provide the vast variety of services that are required at the time that you need it.”<sup>19</sup>

**32.** We asked Deputy Chief Constable (DCC) Amanda Blakeman, operational lead of the Violence Against Women, Domestic Abuse and Sexual Violence Taskforce, what training frontline officers receive around language.<sup>20</sup> She said that all officers receive training on the use of Language Line, the Telephone Interpreter Service, and that mobile technology means these can be accessed both at the location of the victim/offender and within the custody environment. She noted that forces “will also utilise the services of BAWSO to facilitate communication if required.”<sup>21</sup>

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<sup>18</sup> [Equality and Social Justice Committee, 6 June 2022](#), Record of Proceedings, paragraph 120

<sup>19</sup> [Equality and Social Justice Committee, 6 June 2022](#), Record of Proceedings, paragraph 156

<sup>20</sup> [Letter to Deputy Chief Constable Blakeman](#), 20 July 2022

<sup>21</sup> [Letter from Deputy Chief Constable Blakeman](#), 24 August 2022

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**33.** We asked DCC Blakeman to clarify the circumstances in which Police Forces are likely to need Bawso for provision of language and interpretation services.<sup>22</sup> She told us:

*"[...] Forces generally only utilise BAWSO to assist with interpretations where they are already involved with the person. For example, where they are assisting them in reporting incidents to police. They may also utilise them to complete a Domestic Abuse Stalking Harassment form or to obtain initial information to help the Police establish what crimes, if any, the person wants to report."*<sup>23</sup>

**34.** The South Riverside Development Community Centre, Together Creating Communities, Comunidade de Lingua Portuguesa Wrexham, Vesta SFS, Bawso, Henna Foundation and Women Connect First shared their response to the Welsh Government's consultation on the new VAWDASV strategy with us. They noted:

*"The strategy provides no information about how the Welsh Government intends to ensure that awareness-raising campaigns, as well as information about rights and support services, reach individuals, families and communities who are not fluent in English or Welsh."*<sup>24</sup>

## Welsh Government view

**35.** We asked the Minister what action the Welsh Government is taking to break down the language barriers which prevent people accessing services. Referring to the support delivered by specialist services funded by the Welsh Government, Jane Hutt told us that the support "includes access to language and interpretation. This has to be taken into account in terms of the services that they deliver".<sup>25</sup>

**36.** A Welsh Government official confirmed that Language Line provides access to translators within minutes. She also noted that part of the Anti-racist Wales Action Plan is "to make sure that all health services reflect on the importance of the consultation and the engagement with health services, that the offer can be taken up in whatever language the person feels most comfortable in."<sup>26</sup>

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<sup>22</sup> Letter to Deputy Chief Constable Blakeman, 10 October 2022

<sup>23</sup> Letter from Deputy Chief Constable Blakeman, 14 October 2022

<sup>24</sup> South Riverside Development Community Centre, Together Creating Communities, Comunidade de Lingua Portuguesa Wrexham, Vesta SFS, Bawso, Henna Foundation and Women Connect First, written evidence

<sup>25</sup> Equality and Social Justice Committee, 27 June 2022, Record of Proceedings, paragraph 88

<sup>26</sup> Equality and Social Justice Committee, 27 June 2022, Record of Proceedings, paragraphs 89-91

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**37.** The Health Minister highlighted the 'Ask for ANI' campaign material which has been circulated to community pharmacies.<sup>27</sup> Eluned Morgan agreed that more could be done to make sure that materials are available in difference languages, and added: "...that is something that we'll take up, partly as a result of you bringing this matter to our attention."<sup>28</sup>

## Cultural norms

**38.** Many women may not recognise that they are in an abusive relationship, due to the cultural, societal and religious landscape in which they have been raised and in which they continue to live.

**39.** Hannana Siddiqui of the Southall Black Sisters noted issues that migrant women can face which are specific to their communities:

*"[...] there may be cultural norms such as notions of shame and honour that may be used, or religious and cultural laws that may be used to justify violence against women, because it's based on very conservative notions of gender roles. So, you do have certain forms of harmful practices that exist within minority communities that don't exist elsewhere. So, things like forced marriage, honour-based violence and FGM, but there are also high levels, like other communities, of domestic and sexual violence as well, which they share with other communities."*<sup>29</sup>

## Immigration abuse

**40.** Existing literature, including research by the Angelou Centre on behalf of the Domestic Abuse Commissioner for England and Wales<sup>30</sup>, has shown that perpetrators of domestic abuse will often use a victim's insecure immigration status to exert control over them. Immigration abuse sits within the definition of economic abuse and is a form of coercive control. Key examples include:

- falsifying a victim's immigration status and/or bringing someone into the UK with an incorrect visa to ensure they remain vulnerable to immigration enforcement;
- withholding passports or key documents;

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<sup>27</sup> Ask for ANI (Action Needed Immediately) is a codeword scheme developed by the Home Office that enables victims of domestic abuse to discreetly ask for immediate help in participating pharmacies

<sup>28</sup> [Equality and Social Justice Committee, 27 June 2022](#), Record of Proceedings, paragraph 98

<sup>29</sup> [Equality and Social Justice Committee, 16 May 2022](#), Record of Proceedings, paragraph 18

<sup>30</sup> Domestic Abuse Commissioner, [Safety Before Status report](#), October 2021

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- intentionally mismanaging a victim's immigration application or status so they become overstayers; and
- deliberately using a victim/survivors immigration status to control/threaten them (by reporting them to the Police).

**41.** Dr Alexandria Innes of City, University of London, noted that fear of immigration removal "is often greater than the fear of abuse."<sup>31</sup>

**42.** Jenny Phillimore, Professor of Migration and Superdiversity at the University of Birmingham, told us:

*"There's very clear evidence that an individual's migration status can make them more vulnerable to domestic violence, and make it more difficult for them to escape an abusive relationship."*

**43.** Professor Phillimore added that immigration abuse "renders women powerless if they are dependent on someone for a home, for a roof, and to not be deported and shame their entire family."<sup>32</sup>

**44.** Dr Alexandria Innes explained:

*"Any migrant women might face a lack of knowledge regarding standardised reporting practices and cultural or functional norms. Lack of language ability can also prevent reporting: not just on a practical level, but also in terms of possessing the confidence to report abuse and seek help".<sup>33</sup>*

## **Our view**

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Previous research has shown that migrant women are disproportionately affected by gender-based violence and abuse due to a number of factors including cultural norms and immigration abuse. We heard compelling evidence as to how migrant women may be unaware of their rights; unaware of what constitutes abusive behaviour; and unable or unwilling to seek help as a result of control exerted by perpetrators using immigration status as a deterrent, in addition to the challenges faced by those with No Recourse to Public Funds. This combination of factors means that this group of women cannot be treated with the same broad approach as applied

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<sup>31</sup> [Dr Alexandria Innes, Violence and Society Centre at City, University of London](#), written evidence

<sup>32</sup> [Equality and Social Justice Committee, 16 May 2022](#), Record of Proceedings, paragraph 21

<sup>33</sup> [Dr Alexandria Innes, Violence and Society Centre at City, University of London](#), written evidence

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to the rest of the population and require instead a more tailored approach, taking their specific needs into account.

While the review of the Uncharted Territory report suggested that progress has been made in some aspects of this work, it has been disappointing to learn that many of the challenges still remain. Birmingham University's SEREDA report refers to a "dearth of services" available to support individuals from minority groups suffering SGBV, which is also reflected in the evidence we heard. The report said that opportunities should be grasped for investment in SGBV services for forced migrants.

### **Language barriers**

The challenge presented by language was a core theme running throughout our inquiry. We witnessed first-hand the difficulties in communication during our focus group sessions, and were told that language barriers are a key challenge for migrant women and can have significant implications for awareness raising, prevention and access to services, frustrating attempts by public bodies to reach out to migrant communities.

We heard concerns about the limited availability of interpretation for women when accessing services and anecdotal evidence that some women are forced to rely on community or family members instead. This can lead to misrepresentation – particularly if legal matters are being discussed – and should not be relied upon as a substitute for professional interpretation services.

We note the availability of Language Line and its use by public services, including the Police. We also heard that the Police are turning to Bawso for interpretation needs, although they told us that this occurs only in specific cases. More needs to be done to ensure that family and friends are only used as interpreters in exceptional circumstances, and that professional interpretation is available when it is needed at all stages of engagement with support services.

Given the potential for misrepresentation it is not appropriate to rely on community or family members to provide this interpretation. It is imperative that the Welsh Government addresses these issues. One option could be the creation of a directory of interpreters, accessible by all organisations who may come into contact with these women.

**Recommendation 1.** The Welsh Government should set out how it intends to address the problems highlighted around language and interpretation provision to migrant women. This must include outlining the steps it will take to prevent statutory agencies using family members and / or Bawso as interpreters, unless in urgent or emergency cases. To support agencies in that

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regard, the Welsh Government should also consider creating a directory of recognised interpreters.

## **Awareness raising**

**45.** Cultural norms and language barriers can all hinder attempts to raise awareness among migrant communities of their rights, entitlements and where they can access services.

**46.** The Welsh Government's new VAWDASV Strategy notes that awareness raising is a key tool to facilitate prevention, and that its approach aims "to facilitate behaviour change at the whole society level through public discussion which would de-normalise VAWDASV and the attitudes that support it."<sup>34</sup>

**47.** The importance of working directly with communities on awareness-raising strategies was also raised by a number of respondents in evidence including from Bawso, the WLGA and Welsh Women's Aid (WWA).

**48.** Wanjiku Mbugua-Ngotho of Bawso spoke of the challenges of reaching victims and raising awareness in communities and noted "if we're going to look for a way of raising awareness—this is again on the prevention agenda—we're going to go to spaces where these people attend, where people are allowed to go to regularly."<sup>35</sup>

**49.** Some participants in our focus groups explained that whilst it is important that a range of support services are on offer, which can be accessed in a variety of ways, digital exclusion can also pose a significant barrier for many. They agreed that effective awareness raising involved using a variety of channels to reach people with varying needs and abilities, who may consume information in different ways. This included advertising support available on buses, through community groups, traditional media such as television and radio, as well as social media. Participants emphasised the need to ensure information is available in different languages.<sup>36</sup>

**50.** The Minister highlighted the Live Fear Free campaigns, which "provide practical advice for those who may be suffering abuse as well as highlighting the support available to enable friends, family and the wider community to recognise abuse and take safe action."<sup>37</sup>

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<sup>34</sup> Welsh Government, [National Strategy on Violence against Women, Domestic Abuse and Sexual Violence 2016-21](#), November 2016

<sup>35</sup> [Equality and Social Justice Committee, 6 June 2022](#), Record of Proceedings, paragraph 77

<sup>36</sup> [Summary of engagement](#)

<sup>37</sup> Welsh Government, [written evidence paper](#), June 2022

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**51.** However, the women we spoke to in our focus groups had little awareness of the campaign and raised a question of trust. One contributor said: “The time it takes to earn trust for someone to feel empowered to use that helpline is massive.”<sup>38</sup>

**52.** Race Council Cymru (RCC) noted that the impact of campaigns such as the Welsh Government’s ‘Home Shouldn’t be a Place of Fear’, launched during the pandemic to let victims know how they could access help and support even during national lockdowns, “cannot be underestimated.”<sup>39</sup>

**53.** Andrea Cleaver of the Welsh Refugee Council (WRC) highlighted their “asylum guides”, which:

*“[...] fund people who are in the asylum system to guide others going through the asylum system. So, it's that peer-to-peer coaching, mentoring and support. And that helps to break down those trust barriers and to help people to integrate quicker.”*<sup>40</sup>

**54.** Professor Phillimore referred to successful initiatives abroad:

*“[...] a lot of the initiatives that have been successful in other countries, particularly Sweden and Turkey, are actually raising people's awareness about what constitutes violence, and what their rights and entitlements are.”*<sup>41</sup>

## Prevention strategies

**55.** The new VAWDASV Strategy notes that prevention work is designed “to ensure that survivors as individuals are supported holistically and that there is a wider societal effect which reduces the chances that they would experience VAWDASV in the first place.”<sup>42</sup>

**56.** When talking about prevention, both PHW and the WLGA stressed the need to work with perpetrators to address cultural norms. Joanne Hopkins of PHW cited the 2021 report by the Wales Violence Prevention Unit which reviewed ‘What works to prevent VAWDASV’.<sup>43</sup> The report recommended that further research is required to consider effective programmes for the prevention of VAWDASV within migrant communities.

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<sup>38</sup> [Summary of engagement](#)

<sup>39</sup> [Race Council Cymru, written evidence](#)

<sup>40</sup> [Equality and Social Justice Committee, 6 June 2022](#), Record of Proceedings, paragraph 107

<sup>41</sup> [Equality and Social Justice Committee, 16 May 2022](#), Record of Proceedings, paragraph 16

<sup>42</sup> Welsh Government, [Violence against women, domestic abuse and sexual violence: strategy 2022 to 2026](#), May 2022

<sup>43</sup> [Public Health Wales, written evidence](#)

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**57.** Bawso stressed the importance of working with communities, explaining that migrant women are not threatened solely by male-female abuse, but also cultural abuses like forced marriage, Female Genital Mutilation (FGM) and so-called honour-based violence.<sup>44</sup>

**58.** Wanjiku Mbugua-Ngotho of Bawso said:

*"The prevention agenda is not there, because we're funded to work when the issue has already happened, when domestic abuse has taken place. We're supporting people who are already going through domestic abuse, but what about capturing them long before it happens? The work on prevention is not there, and I think that's something that the Welsh Government could fund."*<sup>45</sup>

**59.** Sara Kirkpatrick of WWA noted that commitments have been made by both the Home Office and the Welsh Government in relation to perpetrator interventions but added that that work "needs to be really linked to prevention agendas and community approaches".<sup>46</sup>

**60.** She stressed the importance of prevention work taking place at grass-roots level:

*"[...] VAWDASV people seek support from the places that they trust first, and so the prevention agenda and awareness raising have to get into those spaces, not wait until people reach out of those spaces, and that has to be done at a grass-roots level."*<sup>47</sup>

**61.** RCC also highlighted the importance of survivors' voices in understanding the effectiveness of support services and systems, and to inform their improvement:

*"Survivors' experiences of protection and support services and systems in Wales are key to understanding their effectiveness and to informing practice and service improvements. Survivors' voices and experiences are also essential to informing prevention work and to ensuring that legislative and policy developments, the National Strategy and National Adviser's Plan place survivors' needs and experiences at the centre."*<sup>48</sup>

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<sup>44</sup> Equality and Social Justice Committee, 6 June 2022, Record of Proceedings, paragraph 24

<sup>45</sup> Equality and Social Justice Committee, 6 June 2022, Record of Proceedings, paragraph 23

<sup>46</sup> Equality and Social Justice Committee, 6 June 2022, Record of Proceedings, paragraph 29

<sup>47</sup> Equality and Social Justice Committee, 6 June 2022, Record of Proceedings, paragraph 81

<sup>48</sup> Race Council Cymru, written evidence

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**62.** In response to our questions on working with the community on awareness raising and prevention strategies, Deputy Chief Constable Blakeman spoke of the importance of the survivor viewpoint in order to understand how best to deploy resources.<sup>49</sup>

### Welsh Government view

**63.** The Minister pointed to several approaches to awareness raising, including resources for teachers to raise awareness of FGM; and a contract with a specialist service supporting victims and survivors of honour-based abuse, to provide twenty free virtual ‘roadshows’ to Welsh professionals to build confidence when challenging honour-based abuse and forced marriage.<sup>50</sup>

**64.** The Minister said that the voice of survivors is “essential” to the Welsh Government’s work and that “a dedicated Survivor Engagement Framework and work stream will form part of the delivery of the refreshed Strategy.”<sup>51</sup> She reinforced this in a statement to coincide with the publication of the new VAWDASV Strategy for 2022-2026, when she told Plenary of the Welsh Government’s commitment to putting the “voices of survivors at the centre of everything we do” including through developing “a survivor voice and involvement panel”.<sup>52</sup>

### Our view

The evidence suggests that migrant women who move to Wales often have limited understanding of their rights and the support available to them. This is particularly relevant to women without children who have less contact with schools, hospitals and other statutory services.

Consideration by policy makers, particularly by local authorities, of how best to communicate with migrant women and wider communities is key to informing women of their rights and the support available. Information around rights, responsibilities and support services must reach further in migrant communities to men as well as perpetrators.

The Welsh Government’s new Strategy focus on awareness raising and prevention is welcome but when considering the needs of migrant women there are additional barriers that need to be addressed, including cultural norms, and the impact of immigration abuse.

<sup>49</sup> Equality and Social Justice Committee, 27 June 2022, Record of Proceedings, paragraph 70

<sup>50</sup> Welsh Government, [written evidence paper](#), June 2022

<sup>51</sup> Welsh Government, [written evidence paper](#), June 2022

<sup>52</sup> Plenary, 28 June 2022, Record of Proceedings, paragraph 388

We heard clearly that awareness raising and prevention strategies need to take place at a grassroots level and that letters, leaflets or even digital communication are not always the most effective methods of communication.

The need for survivors' voices to shape our approach to communication cannot be underestimated, nor can the importance of working within communities to ensure that messages are disseminated. Such work can help to build trust and confidence, both of which are essential to encouraging victims to come forward.

We welcome the Minister's commitment to developing a survivor voice scrutiny and involvement panel. We hope that such a panel would have a role to play in greater engagement with grassroots communities including bringing forward ideas for how awareness raising activities could be better targeted.

The Live Fear Free campaigns are important, but we heard little convincing evidence of their effectiveness in reaching migrant communities. Such campaigns need to be tailored to the specific audience, with communication and language challenges considered as part of the approach.

**Recommendation 2.** The Welsh Government should engage survivors of sexual and gender-based violence from migrant communities and other stakeholders such as local authorities, in the development of a community strategy on awareness raising and prevention, which can form guidance to statutory bodies.

### 3. Accessing support

#### No Recourse to Public Funds (NRPF)

**65.** Another challenge which can prevent migrant women and girls in Wales from accessing services is NRPF. The Uncharted Territory Review noted that “the question of funding for refuge provision for women and girls was as big an issue in 2013 as it is in 2021”.<sup>53</sup>

**66.** Participants in our focus groups highlighted the challenges that are faced by those with NRPF. We were told: “The first thing they ask is, “has she got status?”. If she has no recourse to public funds, Housing Options won’t touch her. Social services, the same thing.”<sup>54</sup>

**67.** One contributor, whose work is supporting migrant women with experience of VAWDASV, gave an example of a pregnant asylum seeker with NRPF:

*“She cries every day saying she’s not comfortable where she is. The accommodation is terrible. There’s smoke in the kitchen, doors are broken and she doesn’t feel safe. She doesn’t know who the accommodation manager is because she’s just been put there and no one has come to see her. Because she has no recourse to public funds, I can’t apply for benefits or accommodation for her ... She’s grateful she’s not on the streets, but the house is very bad.”<sup>55</sup>*

**68.** The Review of Uncharted Territory had highlighted in 2021:

*“Welsh Government state clearly that this is the responsibility of the Home Office. Although this is the case for immigration, in terms of support services, Welsh Government could make funding available for those with NRPF if it chose to.”<sup>56</sup>*

**69.** PHW stated that NRPF “still seems to be falling through the gap of devolved / non devolved responsibility”.<sup>57</sup> RCC noted:

*“NRPF acts as a serious barrier for survivors experiencing violence and abuse with restricted or insecure immigration status in the UK and must be*

<sup>53</sup> Uncharted Territory Review, August 2021

<sup>54</sup> Summary of engagement

<sup>55</sup> Summary of engagement

<sup>56</sup> Uncharted Territory Review, August 2021

<sup>57</sup> Public Health Wales, written evidence

*considered as part of any funding plan to completely end violence against women and girls.”<sup>58</sup>*

**70.** NSPCC Cymru said “that migrant children and those from families with NRPF are invisible in conversations about VAWDASV and the barriers to support.”<sup>59</sup>

**71.** RCC, WWA and Bawso all raised concerns that the number of women subject to NRPF may rise as a result of the EU settlement scheme, wider dispersal of asylum seekers and legislative changes such as the Nationality and Borders Act 2022. RCC said:

*“[...] the threat to EU women’s rights to public services if they are unable to apply for EU settled status leads to uncertainty and loss of basic human rights that EU legislation has progressed and protected, as uncertainty remains over the future of the Human Rights Act.”<sup>60</sup>*

**72.** Data provided by Bawso illustrated that in the financial year 2019-20, 164 enquiries about support for survivors with NRPF led to 76 service users being supported (46%). In the financial year 2020-2021, 219 referrals were received; and 98 service users were supported (45%).<sup>61</sup>

**73.** Membership data from WWA shows that, in 2020-21, there was a 29% increase in the number of survivors who were refused a refuge space due to lack of resourcing, compared to the previous financial year.<sup>62</sup>

**74.** Much of the evidence supported the creation of a dedicated fund to support those with NRPF. Bawso suggested that such a fund could be made available to VAWDASV support services through the existing VAWDASV fund, “by means of an uplift and ring-fencing”. They suggest that:

*“The purpose of the fund would be to enable VAWDASV support services to cover the accommodation and support costs of supporting survivors with NRPF. This part of the fund would be administered centrally (either by the Welsh Government or commissioned to a specialist service such as BAWSO) and would be accessible only to service providers (not to individual service users).”*

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<sup>58</sup> Race Council Cymru, written evidence

<sup>59</sup> NSPCC, written evidence

<sup>60</sup> Race Council Cymru, written evidence; Welsh Women’s Aid and Bawso, written evidence

<sup>61</sup> Welsh Women’s Aid and Bawso, written evidence

<sup>62</sup> Welsh Women’s Aid and Bawso, written evidence

**75.** Evidence from JustRight Scotland highlighted how Scotland is tackling this issue. In March 2021, the Scottish Government published a strategy to improve support for people with NRPF called 'Ending Destitution Together'. Guided by the principles of prevention, partnership and personalisation, it aims to "provide a basic safety net in times of crisis; access to advice and advocacy; and to ensure inclusive approaches to support people and communities."<sup>63</sup>

**76.** The Scottish Government will deliver the strategy in partnership with local government with an initial investment of £500,000 for the first year. Actions include:

- piloting a Hardship Fund to support people with NRPF who are facing crisis situations;
- increasing financial assistance and wider local authority support to destitute families with children and vulnerable adults;
- providing updated guidance and training to support local authority provision of services to people with NRPF;
- improving access to primary and mental health services; and
- investing in diagnostic legal advice delivered in partnership with advocacy support for people subject to NRPF and increase access to specialist immigration advice to support local authorities assisting people with NRPF.

**77.** In 2020, the Home Office launched a pilot project, the Support for Migrant Victims Scheme (SMV).<sup>64</sup> Its purpose is to provide a support net for migrant victims of domestic abuse who do not have access to public funds and, as a result, are unable to access safe accommodation in order to escape abusive relationships. The SMV is operated by Southall Black Sisters with partner organisations across the UK, including Bawso for Wales. Support offered by the SMV included:

- safe accommodation for up to 12 weeks, and an additional 4 weeks in exceptional cases of hardship;
- weekly subsistence payments;
- IDVA support and other appropriate befriending and welfare assistance service;

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<sup>63</sup> Scottish Government, [Ending Destitution Together](#)

<sup>64</sup> [Support for Migrant Victims Scheme](#)

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- signposting to qualified immigration law practitioners to provide advice and representation.

**78.** Bawso noted the SMV as “a really good example of how a good fund can work and the difference that it can make to support women”, they had used the fund to support 85 women in the previous year.<sup>65</sup>

## Welsh Government view

**79.** Finding a solution to the challenges created by NRPF is listed as an immediate priority in the new VAWDASV Strategy. The Minister for Social Justice argued that difficulties faced by people with NRPF were “entirely of the UK Government’s making” adding that a “Westminster-backed scheme has to be the most sustainable way to meet the needs of those who currently have no recourse to public funds and we will continue to press for this”.<sup>66</sup>

**80.** The Minister also outlined a commitment to improve training and guidance on NRPF, noting specifically that Citizens Advice Swansea had been contracted to develop this for public authorities. This guidance was published on 29 June 2022.<sup>67</sup>

**81.** In July 2021, the Welsh Government convened a Steering Group for victims of Violence Against Women, Domestic Abuse and Sexual Violence with NRPF. The Group is chaired by the National Advisers for Violence against Women, Gender-based Violence, Domestic Abuse and Sexual Violence.

**82.** In a statement to Plenary, the Minister confirmed that the Welsh Government was hoping to provide financial help to those subject to NRPF:

*“... we are looking at the possibility of the development of a fund. We have to look at it in terms, again, of our powers. We’ve taken legal advice on this, and we’ll be taking counsel under the Government of Wales Act, and it is, in principle, I can say, legitimate for Welsh Ministers to use financial assistance to help persons subject to no recourse to public funds.”<sup>68</sup>*

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<sup>65</sup> Equality and Social Justice Committee, 6 June 2022, Record of Proceedings, paragraph 109

<sup>66</sup> Welsh Government, [written evidence paper](#), June 2022

<sup>67</sup> Welsh Government, [No Recourse to Public Funds \(NRPF\): guidance](#), June 2022

<sup>68</sup> [Plenary, 28 June 2022](#), Record of Proceedings, paragraph 401

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## Our view

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The policy of No Recourse to Public Funds is a major barrier for those experiencing sexual or gender-based violence who seek support; we are concerned that it is likely to become an even bigger problem as the number of people subject to NRPF increases following the UK's exit from the EU.

While we acknowledge that NRPF is a UK-wide policy in a reserved area of responsibility, there is nevertheless a role for the Welsh Government to develop solutions at a devolved level. We heard strong support for provision of a specific fund to provide immediate financial support for migrant women who are victims or survivors of SGBV and are subject to NRPF. Such a fund would only be accessible to service providers, rather than to individual service users, and could be used to cover the accommodation and support costs of survivors with NRPF until a Home Office decision to support was made. Service providers would have to apply to the central fund as and when the need arises.

The Minister's commitment to looking at what is possible in terms of funding is welcome and we would encourage looking to existing schemes for examples, such as the Scottish Government's 'Ending Destitution Together' strategy. In progressing this work, the Welsh Government should also take into account the outcome of the UK Government's review of their pilot scheme.

During our inquiry, the Welsh Government published its new guidance document on NRPF. We did not have time to take evidence on this, but several witnesses during our sessions had highlighted that training is required to ensure frontline providers fully understand their obligations. Given the complex nature of NRPF it is likely that the success of the guidance in improving understanding and awareness of this contentious area will depend on the training provided to support its rollout.

**Recommendation 3.** The Welsh Government should establish a crisis fund that service providers can access to support migrant women who are victims or survivors of Sexual and Gender Based Violence and are subject to No Recourse to Public Funds, using the Scottish Government's 'Ending Destitution Together' strategy as an example. We expect this work be carried out within the next six months with a view to establishing a fund by July 2023.

**Recommendation 4.** The Welsh Government should publish annual updates on its No Recourse to Public Funds work, including the work of the NRPF steering group; progress with options for supporting migrant women with NRPF being considered, and discussions with the UK Government.

## Interaction between the Social Services and Well-being (Wales) Act and NRPF

**83.** Witnesses including WWA, Bawso and RCC argued that improved implementation of the *Social Services and Well-being (Wales) Act 2014* (the Act) could ensure that the vast majority of survivors with NRPF are able to access refuge or other safe accommodation and support. Each highlighted in their evidence that in Wales, under the Act, social services have a duty to meet the care and support needs of children and adults if it is deemed necessary to prevent a risk of abuse or neglect.<sup>69</sup>

**84.** WWA and Bawso cited several examples to illustrate a lack of understanding of duties under the Act, where services have refused to meet the care and support needs of adult survivors with NRPF.<sup>70</sup> They said this varies across local authorities, with a 'postcode lottery' where one local authority/social services will support a woman in a refuge and another will only support the child.

**85.** The WLGA said there was a tendency to think "it's domestic abuse; it doesn't fall within the Act".<sup>71</sup>

**86.** Bawso and WWA suggested a more consistent approach to embedding the Act could be achieved by:

- stronger leadership underpinned by clear good practice guidance and regular training; and
- establishing a team/network of NRPF specialists who support local authorities and determine eligibility for support.<sup>72</sup>

### Welsh Government view

**87.** The Deputy Minister said that while social services have a duty to assess, they do not have a duty to meet the needs of those subject to immigration control "because of the exceptions in Section 46". Julie Morgan also stated that this issue needs to be looked at in "more depth".<sup>73</sup>

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<sup>69</sup> Welsh Women's Aid and Bawso, written evidence; Race Council Cymru, written evidence

<sup>70</sup> Welsh Women's Aid and Bawso, written evidence

<sup>71</sup> Equality and Social Justice Committee, 6 June 2022, Record of Proceedings, paragraph 186

<sup>72</sup> Welsh Women's Aid and Bawso, written evidence

<sup>73</sup> Equality and Social Justice Committee, 27 June 2022, Record of Proceedings, paragraph 138

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**88.** A Welsh Government official confirmed that “unified safeguarding review work with repository learning from all incidents relating to child practice and adult practice reviews and domestic homicide” was being put together later in the year.<sup>74</sup>

**89.** Following our evidence session, we wrote to the Deputy Minister to seek her view of practice on the ground in relation to social work awareness around duties in relation to children. The Deputy Minister confirmed that to date, no issues had been raised with the National or Regional Safeguarding Boards relating to concerns by migrant women about interacting with or accessing social services or concerns that their children may be at risk of being removed. Julie Morgan added that officials had been asked to raise the matter with the Boards to find out whether any experiences or challenges have been identified.<sup>75</sup>

**90.** The Deputy Minister noted the guidance available, ‘Health and wellbeing provision for refugees and asylum seekers’, published in 2018, which set out the purpose and commitment of the Act; as well as the guidance co-produced with the Welsh Refugee Coalition, published in 2020, about access to social services and other care and support for destitute asylum seekers with NRPF.<sup>76</sup>

## **Our view**

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It is apparent that an inconsistent approach to implementation of the Social Services and Well-being (Wales) Act is adding to the fears of victims coming forward, when the Act should be assisting those in need of support.

We welcome the suggestions from witnesses of how to improve embedding the Act into practice through clearer guidance. We recommend that the Welsh Government should carry out a review of implementation of the Act with a view to taking some of these forward within the next six months.

Clear and thorough guidance is essential in supporting those working under the Act to understand the context within which they are working. We therefore call on the Welsh Government to include an evaluation of its current guidance as part of its review of implementation of the Act, and a commitment to provide training throughout Wales to improve understanding of this guidance.

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<sup>74</sup> [Equality and Social Justice Committee, 27 June 2022](#), Record of Proceedings, paragraph 142

<sup>75</sup> [Letter to the Deputy Minister for Social Services](#), 22 July 2022; [Letter from the Deputy Minister for Social Services](#), 15 August 2022

<sup>76</sup> [Letter from the Deputy Minister for Social Services](#), 15 August 2022

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**Recommendation 5.** The Welsh Government should undertake a review of implementation of the Social Services and Well-being (Wales) Act 2014 to see what impact it has had on migrant women with No Recourse to Public Funds and their children. The review should be carried out within the next six months and should explore ways of ensuring the Act is implemented consistently across Wales.

**Recommendation 6.** The review should include an evaluation of the guidance provided to local authorities on implementation of the Social Services and Well-being (Wales) Act and its role in supporting migrant women and children with No Recourse to Public Funds, to ensure that it is fully reflective of the legal position. This evaluation should also consider options for effective roll out of revised guidance to ensure that it is consistently understood across Wales.

### Capacity of specialist VAWDASV organisations

**91.** Birmingham University's SEREDA report highlighted that only one specialist organisation in Wales, Bawso, is capable of supporting migrant women who have experienced SGBV. Joanne Hopkins of PHW argued that this puts an enormous amount of pressure on this organisation, particularly as many other organisations will refer victims/survivors rather than provide support themselves.<sup>77</sup>

**92.** Wanjiku Mbugua-Ngotho of Bawso told us:

*"We, indeed, have been receiving our core funding from the Welsh Government. [...] While this help is very welcome and we are grateful for it within BAWSO, I believe that it's not enough, especially when it comes to the category of women that we've talked about who have no recourse to public funds."<sup>78</sup>*

**93.** The Equality and Human Rights Commission (EHRC) pointed to "a well-documented insufficiency in funding for VAWDASV services across Wales" and explained that research has shown that "traditional commissioning practices can exclude smaller 'by and for' organisations as they can lack power when participating in consortia and are denied the greatest proportion of funds".

**94.** Staff responsible for providing support to victims of VAWDASV reported during our focus groups that they felt overwhelmed, worked excessively long hours and lacked the necessary

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<sup>77</sup> Equality and Social Justice Committee, 6 June 2022, Record of Proceedings, paragraph 157

<sup>78</sup> Equality and Social Justice Committee, 6 June 2022, Record of Proceedings, paragraph 20

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resources to support women effectively. This was having a detrimental impact on their health and wellbeing.

**95.** The extent to which public services and third sector organisations have clarity and certainty about the funding of specialist support services and subsequent gaps in this provision was a key concern. We wrote to the Minister and in her response, she confirmed the Welsh Government’s plan to offer multi-year grant awards to third sector organisations working in the sector:

*“Welsh Government’s Grant Centre of Excellence has confirmed that strategic policy direction will be changing and therefore VAWDASV Grants will also be aligning to move to multi-year grant awards from the financial year 2023-2024.*

*Going forward, all competitive grants can, unless Ministers or other factors dictate otherwise, be awarded for up to 3 years, with a benchmarking exercise to assess performance at the end of that period. Subject to the outcome of the benchmarking the grant scheme can, if required, then be extended for a further 3 years.”<sup>79</sup>*

## **Welsh Government view**

**96.** The Minister’s written evidence highlights the Uncharted Territory report<sup>80</sup>, which identified specialist services as best placed to deliver support to migrant women experiencing VAWDASV.

**97.** The Minister noted that the Welsh Government’s approach to general, regional and specific VAWDASV funding, the statutory guidance as well as the training framework ensures that “no matter where a victim lives in Wales, there is a strong public and specialist service ready to help.”<sup>81</sup> However, the Minister also acknowledged the findings of the SEREDA report, in particular “there is clear evidence that forced migrant SGBV survivors in Wales need additional support”.

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<sup>79</sup> Letter from the Minister for Social Justice, 20 April 2022

<sup>80</sup> Wales Migration Partnership and Cardiff University, [Uncharted Territory](#), November 2013

<sup>81</sup> Welsh Government, [written evidence paper](#), June 2022

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## Our view

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It is clear that the services provided by Bawso are integral to the support provided to migrant women who have been subject to SGBV, but that levels of demand are putting a strain on its capacity to deliver those services.

Specialist services who play such an important role in protecting victims and survivors must be sustainably funded and we welcome the certainty that the Welsh Government's commitment to multi-year awards of grant funding will provide. Continued and consistent support from specialist services is essential for building relationships within communities and establishing trust among community members.

We suggest that the Welsh Government takes into account that organisations need to plan and therefore a lead-in time to funding streams could be beneficial in terms of allowing services to organise themselves.

## Access to legal advice

**98.** We had not intended to explore access to legal advice, but it was raised by several witnesses including Southall Black Sisters, Professor Phillimore, the WRC and Bawso. Andrea Cleaver of the WRC pointed to a "desert" of legal advice in Wales:

*"...we also know that there is a gap in legal provision, so when people do need help around their immigration status, that also isn't there in Wales—we know that there's a desert."<sup>82</sup>*

**99.** Similarly, the SEREDA study found that survivors wanted better legal support with their asylum claims and awareness raising around legal rights.<sup>83</sup>

**100.** Written evidence from Dr Alexandria Innes noted the importance of such support, stating that "free, accessible legal assistance with complex immigration rules would help women and girls in insecure status."<sup>84</sup>

**101.** During our sessions in Swansea we heard that staff members' time is frequently spent assisting with legal advice and providing support to women who are engaged in the legal system.

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<sup>82</sup> Equality and Social Justice Committee, 6 June 2022, Record of Proceedings, paragraph 31

<sup>83</sup> Forced migration and sexual and gender-based violence: findings from the SEREDA project in Wales, May 2022

<sup>84</sup> Dr Alexandria Innes, Violence and Society Centre at City University of London, written evidence

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**102.** JustRight Scotland explained that Scottish Government funding has enabled them to provide free legal advice to migrant women and said the provision of legal advice was a key element of providing support to migrant victims/survivors.<sup>85</sup>

## Our view

We had not intended to take evidence on access to legal advice, but concerns clearly exist around its provision, with several witnesses noting its importance.

Although there are many challenges facing the legal sector, we were concerned to hear reference to a “desert” of legal provision for migrant women in Wales. Access to legal advice around immigration status should form a standard part of what is offered to provide thorough and meaningful support to migrant victims. This would benefit specialist organisations whose time could be focused elsewhere. The Welsh Government should respond to the concerns that have been raised and set out how it intends to work with the UK Government to address this issue.

In addition, the Welsh Government should consider how it can ensure better access to good quality legal advice by working with stakeholders to consider existing examples of best practice, such as JustRight Scotland.

**Recommendation 7.** The Welsh Government should set out how it intends to work with the UK Government to respond to concerns around provision of legal advice on immigration status for migrant women in Wales.

**Recommendation 8.** The Welsh Government should consider how it can ensure access to good quality legal advice by working with stakeholders to look at models of best practice including JustRight Scotland and report back to this Committee by July 2023

## Training of frontline public services

**103.** Migrant women are likely to encounter a range of public services, including the police, social services, health services and schools before they get any specialist support. These services are important for both providing support and signposting to specialist help for migrant women who are experiencing SGBV. However, we heard evidence that a lack of awareness and understanding of the different immigration rules, migrant rights and entitlements can hinder the effectiveness of the support being provided by frontline services.

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<sup>85</sup> Equality and Social Justice Committee, 6 June 2022, Record of Proceedings, paragraph 234

**104.** Andrea Cleaver noted that the WRC had delivered training to the Royal College of Physicians prior to lockdown, but that at least half of those present “had never heard of the Nation of Sanctuary, let alone all the rules around immigration.”<sup>86</sup>

**105.** Birmingham University’s SEREDA report argued that migrant women and girls can find it difficult to access health services and found a lack of understanding of the needs of diverse communities and how to respond in a culturally appropriate way. Translation of materials was rare, staff were not supported to develop cultural competency and organisations lacked knowledge of how to identify, support and refer individuals with referral pathways being unclear.<sup>87</sup>

**106.** The EHRC’s written evidence noted shortcomings in the support provided by frontline services, including “discrimination, inadequate provision that is not designed to meet their needs, disbelief on the part of service providers, or fear of authorities including social services and immigration.”<sup>88</sup>

**107.** Wanjiku Mbugua-Ngotho of Bawso highlighted the case of an asylum seeker family needing assistance:

*“[...] a few months ago, we had a situation where an asylum-seeking family was going through really horrible domestic abuse, where the perpetrator—mostly due to his post-traumatic stress disorder issues, real bad mental health there—threatened to kill the family. And he meant it; he was going to do it. And the police turned up and they said, ‘Oh, so they are asylum seekers. What do we do with them?’ They left. They left them there and nobody did anything until BAWSO was called in the following day.”<sup>89</sup>*

**108.** In Swansea we heard examples of good practice, particularly around identifying the signs of SGBV and signposting to Bawso. Participants had been referred to Bawso through schools, health visitors and following contact with the Police. However, this was inconsistent with the poor practice we heard from focus group participants in Wrexham.

**109.** PHW, the WLGA and WRC proposed further training delivered on a rolling basis, which should be bespoke or built into existing training programmes.

**110.** Naomi Alleyne of the WLGA noted the importance of an on-going programme:

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<sup>86</sup> Equality and Social Justice Committee, 6 June 2022, Record of Proceedings, paragraph 64

<sup>87</sup> Forced migration and sexual and gender-based violence: findings from the SEREDA project in Wales, May 2022

<sup>88</sup> Equality and Human Rights Commission, written evidence

<sup>89</sup> Equality and Social Justice Committee, 6 June 2022, Record of Proceedings, paragraph 67

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*"[...] you can do training, you can do awareness raising, but staff move on. It's not a one-off event; it needs to be something that's much more ongoing in terms of not only built into existing programmes, but specialist programmes as well [...]"<sup>90</sup>*

**111.** DCC Amanda Blakeman told us that the Police has invested in Domestic Abuse Matters training for staff across Wales including a three day course on so-called honour-based violence.<sup>91</sup>

**112.** We asked DCC Blakeman for more information relating to training. She confirmed:

*"Officers receive training as part of their initial training before they are sent out on the front line. Further training is included on training days as part of a rolling programme especially when new information/legislation is received."<sup>92</sup>*

## **Welsh Government view**

**113.** We asked the Minister about the actions being taken to ensure that staff across Wales receive relevant training. She told us that "training is a key part of what we can do to ensure that public bodies are fit for purpose, in terms of the needs of migrant women".<sup>93</sup>

**114.** The Minister highlighted the National Training Framework, which "raises the profile of issues related to violence against women, domestic abuse and sexual violence (VAWDASV) and up-skills public services to respond more effectively to those experiencing VAWDASV including victims of honour-based abuse, FGM and forced marriage."<sup>94</sup>

**115.** The Minister noted that as of April 2021, over 243,000 people in Wales had accessed training through the National Training Framework. Furthermore, the Welsh Government had commissioned 18 half day training sessions for local authority staff to ensure they are up-to-date with the rights and entitlements of EU Citizens and other migrant groups, including those with NRPF.<sup>95</sup>

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<sup>90</sup> Equality and Social Justice Committee, 6 June 2022, Record of Proceedings, paragraph 129

<sup>91</sup> Equality and Social Justice Committee, 27 June 2022, Record of Proceedings, paragraph 13

<sup>92</sup> Letter from Deputy Chief Constable Blakeman, 24 August 2022

<sup>93</sup> Equality and Social Justice Committee, 27 June 2022, Record of Proceedings, paragraph 110

<sup>94</sup> Welsh Government, written evidence paper, June 2022

<sup>95</sup> Welsh Government, written evidence paper, June 2022

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## Our view

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We heard encouraging examples of good practice in our Swansea focus group, where migrant women had been referred to Bawso through public service providers, which underlines the important link they can provide to support services. However, from our conversations with survivors elsewhere it is evident that this is not always the case.

Witnesses spoke of the need for a consistent approach across Wales. The need for on-going training was also apparent, with some witnesses highlighting the often regular change of staff in these areas. The fact that over 243,000 people have accessed training through the National Training Framework is promising. However, given the complex nature of this area it is imperative that training is regular and consistent and addresses the specific challenges that can arise when dealing with migrant women. These challenges include awareness of cultural norms, NRPF issues and language barriers. We are concerned that some victims are not getting the right support or failing to access support because of discrimination or disbelief on the part of service providers. Training is extremely important, not just because of the complexities surrounding immigration rules but also to tackle issues such as prejudice, and conscious and unconscious bias.

Therefore the Welsh Government should set out guidance for training on specific issues related to migrant women which can be embedded into regular training across Wales, to improve understanding and to diffuse any potentially discriminatory behaviour exhibited by frontline services.

**Recommendation 9.** The Welsh Government should set out guidance for training on specific issues related to migrant women which can be embedded into regular training across Wales, to improve understanding and to tackle any potentially discriminatory behaviour exhibited by frontline services. This guidance should be published by July 2023.

## 4. Data collection and data sharing

**116.** A lack of robust data makes it difficult to fully ascertain the prevalence rates of sexual and gender-based violence in migrant communities. The collation of data to better understand the needs of migrant women is also frustrated by the fear that data could be shared with agencies for the purpose of immigration control.

### Data collection

**117.** RCC explained that understanding the prevalence of SGBV in migrant communities is difficult as services often do not ask about the nationality or immigration status of those accessing the service leading to large gaps.<sup>96</sup> This was echoed by the SEREDA report, which found little available data to examine the extent of unmet need.

**118.** In their response to a Welsh Government consultation, the South Riverside Development Community Centre, Together Creating Communities, Comunidade de Lingua Portuguesa Wrexham, Vesta SFS, Bawso, Henna Foundation and Women Connect First recommended:

*"The Strategy should include a commitment by the Welsh Government to introduce a common data recording framework for frontline services which includes the **nationality** of survivors referred for support and of perpetrators of abuse."<sup>97</sup>*

**119.** We asked DCC Blakeman whether the Police seek victims' consent when collecting data. She replied:

*"Yes. So, as much as we possibly can, yes, given the fact that, often, we have barriers to come through, such as language, et cetera. So, obviously, we try to do that in a sensitive way, also looking at the fact that the victim will be coming to us mainly at the point of crisis as well."<sup>98</sup>*

### Welsh Government view

**120.** The Minister recognised the lack of data on prevalence rates and highlighted the Uncharted Territory Review's conclusion that data was "sparse".<sup>99</sup> The Minister told us that the

<sup>96</sup> Race Council Cymru, written evidence

<sup>97</sup> South Riverside Development Community Centre, Together Creating Communities, Comunidade de Lingua Portuguesa Wrexham, Vesta SFS, Bawso, Henna Foundation and Women Connect First, written evidence

<sup>98</sup> Equality and Social Justice Committee, 27 June 2022, Record of Proceedings, paragraph 38

<sup>99</sup> Welsh Government, written evidence paper, June 2022

Race Disparity Evidence Unit will help provide better data thus enabling public services to respond.<sup>100</sup>

**121.** Similarly, we asked the Health Minister about the collection of data in relation to access to mental health services and were told that data on migration status not “specifically” monitored. The Minister’s official confirmed that as part of the Anti-racist Wales Action Plan they would begin collecting this data in the future and “increase the quantity, quality and depth of data that we have around women and girls”<sup>101</sup>.

**122.** The Health Minister confirmed that the Welsh Government’s recently-established Evidence Units have developed an Equality Evidence Strategy, scheduled to be published in September 2022, and that priorities for the units are being developed with stakeholders based on commitments already made and emerging requirements, including from the Anti-racist Wales Action Plan. She added that one of the initial tasks of the Race Disparity Evidence Unit will be to identify the gaps in evidence relating to ethnicity and race, following which “the unit will take forward a programme of work to improve the evidence base including ongoing engagement with ethnic minority people to improve their knowledge and trust in how their data will be used to increase their confidence to share data.”<sup>102</sup>

## **Our view**

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Data plays an important role in understanding issues and of the size of the challenge faced. A better understanding of the situation in Wales will help to inform policies and strategies, and to improve the monitoring of success of those policies on the ground.

Considering the evidence we have received during the course of our inquiry, we believe that the data gap in relation to this particular group of women should be prioritised by the Equality, Race and Disability Evidence Units.

It is important that the Welsh Government has a meaningful conversation with citizens about how their data is collected, how it is stored, and how it will be used. The Welsh Government should consult with stakeholders including data justice and human rights experts and data scientists in the creation of these systems.

We also heard how migrant women might not fully understand what information is being collected about them and why. We are aware that the General Data Protection Regulation

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<sup>100</sup> [Equality and Social Justice Committee, 27 June 2022](#), Record of Proceedings, paragraph 115

<sup>101</sup> [Equality and Social Justice Committee, 27 June 2022](#), Record of Proceedings, paragraph 104

<sup>102</sup> [Letter from the Minister for Health and Social Services](#), 23 August 2022

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means that people must be informed about why their data is being collected, and how it will be stored and used. However, we are concerned that this particular group of women may need additional support to make sure they are giving informed consent, and we are concerned that accurate data will not be obtained unless this clarification is offered.

**Recommendation 10.** The Welsh Government should use the new data available through the Equality, Race and Disability Evidence Units to establish baselines to inform future monitoring and targeting of advice and services. This work should be carried out within the next six months.

**Recommendation 11.** The Welsh Government should set out how it plans to ensure that when collecting data on migrant women, they have a clear understanding of what is happening with their data, and how it will inform future decision-making.

## Data sharing

**123.** Frontline services will often be the first to identify women who are either at risk, or victims, and play a key role in ensuring they receive support and are referred to the appropriate services. However, we heard many concerns that these services will share a woman's data and immigration status with the Home Office, and the fear that this will lead to enforcement action being taken.

**124.** The EHRC said that migrant survivors are prevented from reporting abuse to the police for fear that their "data may be shared with immigration enforcement"<sup>103</sup>, and Bawso told us that women were uncomfortable with sharing their information for fear of it being passed on to the Home Office.<sup>104</sup>

**125.** Elizabeth Jiménez-Yáñez of the Step Up Migrant Women coalition told us of a recent case of a woman experiencing a high-risk case of domestic abuse and stalking:

*"She was undocumented, and she was undocumented as part of the abuse. So, she came terrified to our service, and after evaluating and assessing her case, her caseworker recommended reporting it to the police because of the high risk of the situation. [...] eight days after they did an online report to the police, she received an immigration enforcement letter. What is worse is that*

<sup>103</sup> Equality and Social Justice Committee, 6 June 2022, Record of Proceedings, paragraph 45

<sup>104</sup> Equality and Human Rights Commission, written evidence

*the police officers came to her house and when they realised that she was undocumented, they called immigration enforcement in front of her.*"<sup>105</sup>

**126.** Dr Alexandria Innes argued that a well-publicised commitment that anyone seeking support for abuse will not be reported to the Home Office was needed in Wales and that this commitment should include the police, education and healthcare providers and specialised services.<sup>106</sup>

**127.** DCC Amanda Blakeman told us: "There is no legal duty to share information and if Immigration Services were to be a barrier to engagement with the victim, then Police are unlikely to share." Instances where data is shared include multi-agency meetings around managing risk for victims, if that was critical in terms of safeguarding.<sup>107</sup>

**128.** We asked DCC Blakeman for further clarification on what type of data is shared, by which agencies, and under which specific circumstances.<sup>108</sup> She told us the information shared is generic data as opposed to personal data of individuals. Further, she provided us with a guidance document on the sharing of information in relation to victims who may have insecure immigration status, which Police Forces have introduced into Multi-Agency Risk Assessment Conferences (Marac) and use where appropriate.<sup>109</sup> The guidance states:

*"Maracs must ensure that information shared within the process has safeguarding of the victim(s) as the absolute focus. Information sharing should serve the purpose of enhanced protection – for example to enable the victim(s) to access safe accommodation, court protection orders, engage in the family, civil or criminal justice systems, to confirm domestic abuse for legal proceedings or access to other specialist services."*

**129.** We heard calls for a firewall during the course of our inquiry<sup>110</sup>, which would mean a separation between immigration enforcement activities and public service provision.

**130.** Elizabeth Jiménez-Yáñez of the Step Up Migrant Women Coalition suggested that a firewall "would have not only the positive result of allowing victims to report safely, but it would

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<sup>105</sup> [Equality and Social Justice Committee, 16 May 2022](#), Record of Proceedings, paragraph 50

<sup>106</sup> [Dr Alexandria Innes, Violence and Society Centre at City, University of London](#), written evidence

<sup>107</sup> [Deputy Chief Constable Blakeman](#), written evidence

<sup>108</sup> [Letter to Deputy Chief Constable Blakeman, 10 October 2022](#)

<sup>109</sup> [Letter from Deputy Chief Constable Blakeman, 14 October 2022](#)

<sup>110</sup> [Equality and Social Justice Committee, 16 May 2022](#), Record of Proceedings, paragraph 52; [Equality and Social Justice Committee, 6 June 2022](#), Record of Proceedings, paragraph 48

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also take the burden from statutory services, including the police, to have to do immigration-related actions".<sup>111</sup>

**131.** Elizabeth Jiménez-Yáñez pointed to an example of good practice in north Wales, between the north Wales Police and Bawso, where there is a partnership approach in which victims with insecure immigration status are referred to the organisation.<sup>112</sup> She also cited a Dutch policy which works like a firewall:

*"It's a policy called 'safe in, safe out', in which migrants with insecure immigration status can come to police stations and report crime with the certainty that their immigration status won't take precedence or won't be shared with immigration enforcement officers."*<sup>113</sup>

**132.** JustRight Scotland highlighted the benefits of a partnership approach between the police, local authorities and Scottish Government to produce guidance which seeks to clarify the legal position, good practice and highlight the survivor experience. They said it had been useful to ensure the position on data sharing was made clear to migrant communities and provided the example of NHS Scotland.<sup>114</sup>

## Welsh Government view

**133.** We asked the Minister for Health and Social Services about the circumstances in which statutory services would share the immigration with the Home Office. She replied:

*"...we don't share data with the Home Office, unless there is a very extreme reason for us to do that, and, obviously, we then have to comply with UK law. But it would have to be under those extreme circumstances that that would happen. There is no routine sharing of information at all between the NHS and immigration services."*<sup>115</sup>

**134.** The Deputy Minister for Social Services said the Welsh Government was unaware of any data sharing taking place, but that "... we are, as a result of reading it in the evidence given to you, we are going to look at that in more detail."<sup>116</sup>

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<sup>111</sup> Equality and Social Justice Committee, 16 May 2022, Record of Proceedings, paragraph 52

<sup>112</sup> Equality and Social Justice Committee, 16 May 2022, Record of Proceedings, paragraph 126

<sup>113</sup> Equality and Social Justice Committee, 16 May 2022, Record of Proceedings, paragraph 155

<sup>114</sup> JustRight Scotland, written evidence

<sup>115</sup> Equality and Social Justice Committee, 27 June 2022, Record of Proceedings, paragraph 119

<sup>116</sup> Equality and Social Justice Committee, 27 June 2022, Record of Proceedings, paragraph 124

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**135.** We asked the Minister whether a firewall had been considered. She said that she could discuss with the National Partnership Board something “equivalent to a firewall, really, in terms of our powers.”<sup>117</sup>

## **Our view**

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### **Data sharing**

We heard recurring concerns about the sharing of data as well as the impact these concerns can have on the trust of those considering coming forward for help. These concerns can be exacerbated by an apparently inconsistent approach by services involved.

We heard about a partnership approach in Scotland between the Scottish Government, the police and local authorities and consider that demonstrates a commitment to giving clarity to the organisations working with victims and allaying concerns of those involved.

Welsh Police forces shared with us their guidance on the sharing of data, which strikes a balance between safeguarding and the need to protect victims’ rights.

We note the Deputy Minister’s commitment to look into the issue of data sharing and recommend that the Welsh Government takes the lead in working in partnership to produce guidance clarifying the legal position; this should be shared widely with specialist organisations, community groups and the wider public. The guidance should also highlight the impact of data sharing on an individuals’ willingness to ask for help.

**Recommendation 12.** The Welsh Government, in partnership with the Police and local authorities, should take steps through guidance to address concerns about the relationship between data sharing and survivors’ willingness to seek support. This guidance should be shared widely with specialist organisations, community groups and the wider public and should be made available in different languages.

### **Firewall**

Despite assurances from the Ministers and the Police, the message is apparently not clear enough to communities and individuals that their data will not be shared. Guidance clarifying the legal position will assist those services providing support, but the establishment of a firewall

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<sup>117</sup> Equality and Social Justice Committee, 27 June 2022, Record of Proceedings, paragraph 128

to restrict the sharing of data would be a further step in earning the trust of victims and increasing their confidence to reach out and seek support.

**Recommendation 13.** The Welsh Government should establish a firewall which restricts the sharing of data between agencies on those who seek support for Sexual and Gender Based Violence.

## 5. Welsh Government's strategic approach

**136.** We heard evidence from several witnesses including WWA and PHW which highlighted concerns about the representation of migrant women in the Welsh Government's new VAWDASV strategy.

**137.** Sara Kirkpatrick of WWA argued that addressing the needs of migrant women and migrant survivors should be central to the Welsh Government's VAWDASV Strategy, adding: "If we cover the needs of the many, the few will get left out."<sup>118</sup>

**138.** Joanne Hopkins told us of PHW's particular concern about the lack of upfront reference to "displaced people in the broad sense" and noted there is a risk "that migrant women will fall down the cracks of all these plans".<sup>119</sup>

**139.** Wanjiku Mbugua-Ngotho noted Bawso's concerns that specific support for women with NRPF and support for children had been left out of the new Strategy. She told us that while Bawso had responded to the consultation, "that didn't seem to change when the strategy was finalised".<sup>120</sup>

**140.** In terms of working with stakeholders, Andrea Cleaver of the WRC told us:

*"One of the main differences in Scotland is that the Scottish Refugee Council is a strategic partner of the Scottish Government, and that means that it's able to move a lot faster on migrant issues. It's something for Welsh Government to consider."<sup>121</sup>*

**141.** Sara Kirkpatrick of WWA noted the importance of monitoring the outcomes of the Strategy, establishing accountability where actions are not being implemented and providing opportunities to recognise and embed best practice. She said:

*"If we were to take as first principles that idea of no women left behind, of a Nation of Sanctuary that is looking after those who are hurt and harmed, and providing proper support, and checking that that's happening and learning when it's not, we would be making great progress."<sup>122</sup>*

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<sup>118</sup> Equality and Social Justice Committee, 6 June 2022, Record of Proceedings, paragraph 88

<sup>119</sup> Equality and Social Justice Committee, 6 June 2022, Record of Proceedings, paragraph 176

<sup>120</sup> Equality and Social Justice Committee, 6 June 2022, Record of Proceedings, paragraphs 99-101

<sup>121</sup> Equality and Social Justice Committee, 6 June 2022, Record of Proceedings, paragraph 40

<sup>122</sup> Equality and Social Justice Committee, 6 June 2022, Record of Proceedings, paragraph 103

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## Welsh Government view

**142.** During her statement to Plenary on the new Strategy, the Minister noted that it is a “living document” and that she could “quite foresee that we will need a work stream for migrant women”.<sup>123</sup>

**143.** A Partnership Board to oversee implementation of the new Strategy has been established with a series of sub-groups or work-streams to take forward key actions, including “survivor voice”.

**144.** The Minister noted the importance of collaboration in delivering successful plans and told us that Bawso is “hard-wired into every implementation policy group”.<sup>124</sup> She said that Bawso sits on the National Implementation Board and that she would be willing to consider expanding the membership of the board to include the Welsh Refugee Council.<sup>125</sup>

**145.** The Minister’s evidence paper points to a number of actions included in the Nation of Sanctuary Plan, including:

- revisiting the recommendations of the ‘Uncharted Territory: Violence against migrant, refugee and asylum-seeking women in Wales’ report to ascertain the actions which the Welsh Government could take;
- working with stakeholders to develop a sustainable model for the provision of funding to specialist VAWDASV services, including those working with asylum seekers and refugees to ensure reliable support;
- ensuring the needs of asylum seekers and refugees are considered within the national VAWDASV communications framework; and
- giving further consideration to whether the VAWDASV National Training Framework sufficiently addresses the circumstances of refugees and asylum seekers.<sup>126</sup>

**146.** The Minister added that action could be taken to ensure public bodies are made aware of the Welsh Government’s position as a Nation of Sanctuary.

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<sup>123</sup> [Plenary, 28 June 2022](#), RoP para 402

<sup>124</sup> [Equality and Social Justice Committee, 27 June 2022](#), Record of Proceedings, paragraph 197

<sup>125</sup> [Equality and Social Justice Committee, 27 June 2022](#), Record of Proceedings, paragraph 202

<sup>126</sup> Welsh Government, [written evidence paper](#), June 2022

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## Our view

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We welcome the Minister's open approach to the new Strategy and the Welsh Government's engagement with our inquiry. It is clear that more needs to be done to meet the specific needs of migrant women and we therefore call on the Welsh Government to amend the new Strategy to include a workstream on migrant women. This workstream should be supported by a specific survivor group.

As noted earlier in this report, the input of survivors is key in developing future strategies, and we are therefore pleased to see the survivor voice is being embraced as part of the Partnership Board work. We would strongly support the inclusion of the Welsh Refugee Council on the Partnership Board.

We note the actions included in the Nation of Sanctuary Plan. The Welsh Government should publish an updated report to set out its progress in relation to the Plan.

**Recommendation 14.** The Welsh Government should include the Welsh Refugee Council on its National Partnership Board.

**Recommendation 15.** The Welsh Government should amend its Strategy on Violence against Women, Domestic Abuse and Sexual Violence for 2022-26 to include a section which deals specifically with the needs of migrant women and children and those subject to the No Recourse to Public Funds.

## Annex A: List of oral evidence sessions.

The following witnesses provided oral evidence to the committee on the dates noted below. **Transcripts of all oral evidence sessions can be viewed on the Committee's website.**

Date	Name and Organisation
16 May 2022	<p><b>Professor Jenny Phillimore</b> University of Birmingham</p> <p><b>Elizabeth Jiménez-Yáñez</b> Step-up Migrant Women Coalition</p> <p><b>Hannana Siddiqui, Head of Policy, Research and Fundraising</b> Southall Black Sisters</p> <p><b>Ginger Wiegand</b> Equality and Human Rights Commission</p>
6 June 2022	<p><b>Sara Kirkpatrick</b> Welsh Women's Aid</p> <p><b>Wanjiku Mbugua-Ngotho</b> BAWSO</p> <p><b>Andrea Cleaver</b> Welsh Refugee Council</p> <p><b>Joanne Hopkins</b> Public Health Wales</p> <p><b>Naomi Alleyne</b> Welsh Local Government Association</p> <p><b>Kirsty Thomson</b> JustRight Scotland</p>
27 June 2022	<p><b>Deputy Chief Constable Amanda Blakeman</b> Gwent Police</p> <p><b>Jane Hutt MS, Minister for Social Justice</b> Welsh Government</p>

Date	Name and Organisation
	<p><b>Eluned Morgan MS, Minister for Health and Social Services</b> Welsh Government</p> <p><b>Julie Morgan MS, Deputy Minister for Social Services</b> Welsh Government</p>

## Annex B: List of written evidence

The following people and organisations provided written evidence to the Committee. All Consultation responses and additional written information can be viewed on the

**[Committee's website](#)**.

Reference	Organisation
<b>MW01</b>	South Riverside Community Development Centre, TCC (Trefnu Cymunedol Cymru/Together Creating Communities), CLPW (Comunidade de Lingua Portuguesa Wrexham), Vesta SFS, Bawso, Henna Foundation, and Women Connect First
<b>MW02</b>	NSPCC
<b>MW03</b>	Race Council Cymru
<b>MW04</b>	Public Health Wales
<b>MW05</b>	Equality and Human Rights Commission
<b>MW06</b>	Dr A Innes, Violence and Society Centre at City, University of London and the UKRI Prevention Research Partnership VISION Consortium
<b>MW07</b>	Welsh Women's Aid and Bawso