

EXPLANATORY MEMORANDUM

Statutory Guidance under Section 15 of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.

National Training Framework

This explanatory memorandum has been prepared by the Education and Public Services Group and is laid before the National Assembly for Wales in conjunction with the above guidance made under the Act, and in accordance with Standing Orders 27.1 and 27.14.

Minister's Declaration

In my view, this Explanatory Memorandum gives a fair and reasonable view of the expected impact of the National Training Framework Statutory Guidance under the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015. I am satisfied that the benefits outweigh any costs.

[Leighton Andrews]

Minister for Public Services
25 January 2016

1. Description

This document sets out the design and requirements of the National Training Framework on violence against women, domestic abuse and sexual violence.

The section for specific consideration by the National Assembly for Wales, in accordance with section 16 of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 (“the Act”), is section 4 of the guidance. It is proposed that subject to the approval of the Assembly, this section will be issued under section 15 of the Act and outlines specific requirements on relevant authorities (as defined in section 14 of the Act) in relation to the Framework.

The remainder of the guidance will be issued under section 60 of the Government of Wales Act 2006, and as such is not being laid before the Assembly in accordance with section 16 of the Act. However, the whole document has been laid before the Assembly to provide context and transparency. The remainder of the document provides guidance to assist relevant authorities in implementing the National Training Framework as well as to assist interested persons to engage with and benefit from the Framework.

2. Matters of special interest to the Constitutional and Legislative Affairs Committee

The Committee may wish to note that this Statutory Guidance is the first guidance document to be laid before the Assembly under section 16 of the Act.

3. Legislative background

The Act received Royal Assent on 29 April 2015. The Act ensures a focus across the public sector on the prevention of these issues, the protection of victims and the support for those affected by such issues.

The provisions within the Act strengthen the leadership and strategic approach to violence against women, domestic abuse and sexual violence.

Section 15 of the Act provides the Welsh Ministers with the power to issue guidance to relevant authorities on how in the exercise of their functions they could contribute to the achievement of the purpose of the Act. Section 16 of the Act requires the guidance to be laid before the Assembly in draft before being issued.

Section 60 of the Government of Wales Act 2006 enables the Welsh Ministers to do anything which they consider appropriate to promote or improve the economic, social and environmental well-being of Wales. The guidance published under section 60 will provide further assistance to relevant authorities and other bodies in relation to violence against women, domestic abuse and sexual violence.

4. Purpose and intended effect of the Statutory Guidance

The guidance outlines the National Training Framework on violence against women, domestic abuse and sexual violence. Section 4 of the document issues guidance under section 15 of the Act to relevant authorities on how they should exercise their functions in relation to the delivery and standards of training on violence against women, domestic abuse and sexual violence.

In establishing the Framework the Welsh Government aims to create a consistent standard of care for those who experience violence against women, domestic abuse and sexual violence. To ensure an unfailing standard of service throughout the public service the Framework has two main functions:

- 1) Consistent, proportionately disseminated training for relevant authorities to fundamentally improve the understanding of the general workforce and, therefore the response to those who experience violence against women, domestic abuse and sexual violence.
- 2) Alignment of existing specialist training to further professionalise the specialist sector, to improve consistency of specialist subject training provision nationally and to set core requirements of specialist service provision.

5. Consultation

Two consultations have been undertaken in relation to the National Training Framework. The first focussed on the content and structure of the Framework to facilitate needs led and stakeholder informed delivery whilst the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 progressed through Assembly scrutiny. This consultation was held between 23 October - 19 December 2014 and engaged forty six respondents. A parallel survivor engagement exercise was run at the same time which engaged fifty eight participants who had both experienced abuse and who were seeking help due to their use of abuse within intimate partner relationships.

The second consultation ran for twelve weeks between 31 July – 23 October 2015 with a total of 51 responses received. A consultation event was also held in October, which engaged 44 participants.

Links to both consultations are provided below:

<http://gov.wales/consultations/people-and-communities/national-training-framework-on-gender-based-violence/?lang=en>

<http://gov.wales/consultations/people-and-communities/national-training-framework-on-violence-abuse/?lang=en>

The summary of responses to the formal consultation is published alongside this document. The response to the consultation, and to the National Training Framework itself, was overwhelmingly positive and included:

- Support for the level of engagement and stakeholder participation within development of the NTF;
- Support for the inbuilt flexibility of the model (although one or two respondents called for more prescriptive information in some examples); and
- Strong support for regional implementation.

In order to further improve the statutory guidance respondents to the consultation called for:

- More detail in some elements of the Framework and a stronger focus on engaging leadership and holding this group to account.
- The NTF to be applied beyond the parameters of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 to apply the requirements of the statutory guidance to professionals working in the non devolved, contracted and third sectors.
- Improved alignment of implementation of the NTF with training activity linked to the Social Services and Well-being (Wales) Act 2014.
- Additional references to children's experience of violence against women, domestic abuse and sexual violence.

The main issues which have been revised in the Statutory Guidance following the consultation are:

- Revisions to the requirements to strengthen local governance arrangements for implementation of the National Training Framework and leadership engagement in oversight and monitoring.
- Clarification over regional implementation and co-ordination.
- A requirement for explicit references to the needs of all family members within the local training needs analysis to ensure that the needs of both adults and children are sufficiently assessed in local implementation and the inclusion of child focussed professionals within group 4 of the Framework.
- Additional references to corresponding legislation (specifically the Social Services and Well-being (Wales) Act 2014 and the Well-being of Future Generations (Wales) Act 2015 to improve alignment in the implementation of the legislation (this is also further improved in supporting policy and pilot work).
- Clarified timescales for implementation and rollout of the group 1 training.
- An explicit requirement regarding "refresher" training.
- A clarified requirement regarding Continuous Professional Development for specialist services.

More detailed responses to the consultation are available in the formal consultation response document which is provided at appendix 1.

6. Regulatory Impact Assessment (RIA)

No separate RIA has been prepared as the Impact Assessment prepared for the Act is still relevant and a copy can be found on the Welsh Government website:

<http://gov.wales/docs/dsjlg/publications/commsafety/150501-explanatory-memorandum-vawdasv-en.pdf>

Appendix 1

A response from the Welsh Government to the public consultation on the draft statutory guidance on the National Training Framework on violence against women, domestic abuse and sexual violence.

Introduction

This document outlines a summary analysis of the responses received to the public consultation on draft statutory guidance on the National Training Framework on violence against women, domestic abuse and sexual violence. It will outline the responses received in the consultation and how these responses have informed how the Welsh Government intend to further develop and implement the Framework. The report will outline the general themes of the feedback and focus primarily on those pieces of feedback we received multiple times.

It is not possible in this document to represent individual comments or one-off pieces of feedback but each response received to the consultation has been considered individually. Individual response have also been published separately.

The Welsh Government would like to thank each individual and organisation who submitted a response to the consultation and those who attended the consultation event held in October 2015. Each response submitted as part of this exercise is valued and has been considered carefully.

Summary of respondents

The entire consultation exercise engaged 95 individuals.

51 responses were received to the written public consultation. A summary of the profiles of these respondents is provided below:

Organisation profile	Number of individual responses
Housing	4
Local Government/Local Authority	12
Health	9
Fire and Rescue Authority	3
Police/PCC	1
Probation	1
Specialist sector/interest groups	16
Care Council for Wales	1
Union	2
Individual other	2
Total	51

A consultation event was also held on the 9th October 2015. This event engaged 44 attendees. A summary of the profiles of these attendees is provided below:

Attendee profile	Number of individuals
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Health	6
Specialist sector/interest groups	15
Police	4
Local Government/Local Authority	13
Probation/Community Rehabilitation Company	6
Total	44

A full list of respondents (excluding those who requested anonymity) is provided in appendix a.

Summary of key issues

The consultation process provided an overwhelmingly positive response on the NTF. It was welcomed by every respondent and most constructive feedback received through the written consultation focussed on the detail of the Framework and the intricacies of implementation.

“We are very supportive of Welsh Government proposals to develop the NTF to foster a more consistent and coherent approach to training for public sector professionals in these areas. We believe that this approach has the potential to have a significant impact on the lives and experiences of victims of Wales. We congratulate Welsh Government on being the first administration in the UK to commit to a holistic approach to training across the public service on these issues”. (Respondent 023)

Although the consultation event also aimed to facilitate discussions at this level (and did to a certain extent), more operational feedback was provided here, including the challenges associated with rolling out elearning in localities and requests for a prescribed approach to what local leadership would look like.

There was support for the level of engagement and stakeholder participation within development of the NTF so far. The inbuilt flexibility of the model was welcomed although one or two respondents called for more prescriptive information in some examples. There was strong support for regional implementation.

“The existing arrangements for Local Safeguarding Children Boards, regional collaboration boards, community safety partnerships naturally lend themselves to multi agency collaboration and joint planning around agreed priorities, the aspiration for regional planning and consistency of delivery doesn't lend itself to isolated working practices”. (Respondent 011)
“Regional Safeguarding Boards would provide the strategic infrastructure. Many have training sub groups in place”.

More constructively, respondents also called for more detail in some elements of the Framework and a stronger focus on engaging leadership and holding this group to account. Many respondents requested that the NTF be applied beyond the parameters of the Violence against Women, Domestic

Abuse and Sexual Violence (Wales) Act 2015 to apply the requirements of the statutory guidance to professionals working in the non devolved, contracted and third sectors.

Specific commentaries on the themes of the feedback are provided below, along with a summary of comments related to each group within the Framework.

1. The requirements proposed under section 15 of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.

The consultation responses outlined general support for the requirements of the NTF and the way such requirements would be evidenced (the training needs analysis and plan). The specific suggestions received to further develop the requirements are listed below:

- For the need for inclusion for all forms of violence against women, domestic abuse and sexual abuse to be specified in the requirements relating to the needs analysis to ensure some less well recognised elements of violence against women, domestic abuse and sexual abuse would not get missed.

“It is imperative that the Training Needs Analysis, on which the plan is based, pays equal attention to the requirements of each group within the National Training Framework and ensures that the learning needs of each group, with regards to sexual violence, are fully recognised”. (Respondent 028)

- A child specific training analysis be incorporated into the general requirements currently outlined in the guidance, to be informed by the child and young person elements of the population needs assessments and the local assessments of wellbeing, as required by the Social Services and Well-being (Wales) Act 2014 (“Social Services Act”) and the Well-being of Future Generations (Wales) Act 2015 (“Well-being Act”).
- Activity related to fulfilling the requirements of the NTF should be made a requirement of the local Social Care Workforce Development Partnership (SCWDP) plan.
- A further requirement be placed on regional education consortia to ensure that workforce development programmes delivered within education include the requirements of the relevant groups within the NTF.
- Two respondents suggested that reference to the United Nations Convention on the Rights of the Child be specified as a requirement of the training needs analysis and that this also be considered when Ministers review submitted analyses and plans.

- One respondent suggested a requirement that the training plans of each relevant authority be published.
- Calls were made for a formal requirement of refresher training for group 1 to be outlined within the guidance. Some respondents requested that completion of the eLearning be a bi-annual requirement.

Welsh Government response

Each of these proposals were considered for inclusion.

In relation, specifically to the United Nations Convention on the Rights of the Child; a specific reference to this is not required because when developing the NTF guidance, the Welsh Ministers have had regard to the UNCRC (A Children’s Rights Impact Assessment is published alongside this response). As a result, the relevant authority’s will indirectly have had regard to it.

Moreover, section 7(2) of the Social Services and Well-being (Wales) Act 2014, requires that when a local authority and Local Health Board is exercising functions in relation to children under that Act, they must have regard to Part 1 of the UNCRC. This would include the function of conducting the section 14 population needs assessment. When developing their local strategy, a local authority and LHB are under a duty to have regards to the needs assessment. The first population assessment is due no later than 1 April 2017.

Sanctions

Some respondents requested further advice on the sanctions which would be imposed on relevant authorities if they did not comply with the statutory guidance or deliver against their submitted plans.

Welsh Government response

As outlined in section 17 of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015, relevant authorities are required to follow any guidance that is issued under section 15. However, they do not have to follow the statutory guidance if it “would be unreasonable for them to do so” or the following criteria are met:

- there is a good reason for them not to;
- they have an alternative policy; and
- they issue a policy statement in accordance with section 18 of the Act.

If the relevant authority does not provide a policy statement setting out an alternative approach or the Welsh Ministers consider the alternative approach outlined in the policy statement is not likely to contribute to the purpose of the Act, the Welsh Ministers may “direct” them to take any action which the Welsh Ministers consider appropriate. The relevant authority must comply with the

direction which is enforceable by mandatory order. The order would be sought at the High Court by or on behalf of the Welsh Ministers.

Failure to follow a mandatory order is contempt of court and is punishable by fine.

In addition to the power outlined above, it would be possible for a person to challenge the compliance or delivery of a relevant authority against the statutory guidance by way of judicial review. In such a case a variety of remedies are available to the court.

These sanctions will not be further outlined in the guidance as they are referred in the Act.

“Funded workers”

There were also multiple questions as to whether the requirement for relevant authority “funded “ workers placed a duty on the funder or the workers organisation in relation to meeting the training need for groups 4 and 5 of the Framework.

Welsh Government response

Following detailed consideration of these comments, reference to funded workers has been removed from the guidance. The reason for this removal is to avoid an unintended consequence that a requirement to supply a funded worker’s professional development could have a detrimental impact on the current salary rate of specialist workers (which is not consistent) should the finances to resource this requirement be sourced from existing monetary sources rather than from additional funding.

The Welsh Government will seek to provide further clarity around funding for specialist workers and their professional development as part of the development of subsequent future guidance and complementary policy activity related to commissioning and regional service provision.

2. Leadership and governance

Regional Safeguarding Boards were repeatedly named as the governance structure most relevant to the NTF and the multi agency forum most suitable to oversee regional implementation. There were also a few suggestions that governance be strategically integrated with Public Service Boards. Respondents want clear and careful monitoring of implementation of the NTF via the governance board.

There were some calls for clarification over the role of the current Domestic Abuse Co-ordinators in relation to delivery of the NTF. These calls mainly came from the Domestic Abuse Co-ordinators themselves but some respondents also suggested that local leads for the implementation of the NTF be further clarified beyond the current guidance which states:

“The local training plan is to be co-ordinated by the Local Authority, i.e., the regional lead of violence against women, domestic abuse and sexual violence within the Local Authority”.

Feedback in relation to this was particularly strong in the consultation events.

“What is required is a single point of contact who would, on behalf of the "region" undertake the work to design, develop, and monitor the training plan reporting back within the designated governance structure. It would make sense if this was the regional domestic abuse strategic coordinator”
(Respondent 011)

Welsh Government response

The guidance will be reviewed to ensure that options for governance and operational co-ordination are laid out clearly.

It is acknowledged that the corresponding policy areas relating to pilot regionalisation of Violence against Women, Domestic Abuse and Sexual Violence co-ordination, funding and service provision and commissioning inter-relate to oversight of the National Training Framework. The parallel development of this work has led to questions about what the future of leadership and co-ordination in this area will look like. These developing policy areas will provide clarity in time and but at this stage the Welsh Government aim to provide guidance which is reasonable and allows flexibility of implementation which is determined by local need and infrastructure.

3. Regional application

There was general support for regional implementation of the NTF. Some comments were made regarding the challenges associated with developing training plans and needs analysis across Local Authorities and Health Boards and some requests were made that Local Authorities and Health Boards develop their own plans and these are dealt with separately and reviewed through individual regional governance structures.

Whilst there was general support for the lead for regional implementation to be placed within the Local Authority, this support did not extend to responses received from Health who suggested a separate health-based lead, possibly within the safeguarding team, should hold this specific responsibility for health. Some questioned why the lead for the work had been linked to Local Authorities. This link had been made as the current Domestic Abuse Co-ordinator role is based within the Local Authority and the future Regional Advisor role, currently being piloted by the Welsh Government will also be based here. It is hoped that the Regional Advisor will have a strategic role which can draw in all relevant authorities.

“Unclear why it is proposed that the local training plan be co-ordinated by the Local Authority as HBs cover more than one LA. May be better for HBs to complete their own training plans”. (Respondent 011)

Whilst some respondents favoured a multi agency training plan across all relevant authorities within a region (primarily specialist third sector respondents), others referenced the challenges of multi agency training delivery when balancing the capacity of relevant staff (primarily respondents working within the relevant authorities).

The role of Workforce development teams was referenced in several responses as key to the implementation of the NTF. Feedback in relation to this was particularly strong in the consultation events.

“Workforce Development Teams in Social Services will need to play a pivotal role in this. Whilst the training needs to be delivered to those outside the Social Care Sector WDT teams are already in a position to capture training records for staff in Local Authorities and to be able to report data in this area”. (Respondent 003)

Welsh Government response

The Welsh Government agree that Workforce development teams have an important role to play in rollout of the National Training Framework and will continue to seek to engage with this audience.

In terms of training delivery, the regional implementation of the NTF relates most directly to groups 2 and 3 of the Framework. We will consider further, as part of the “Ask and Act” pilot work underway this year and next, the opportunities and challenges relating to regional implementation and reflect this learning in the “Ask and Act” guidance.

The National Training Framework guidance will be reviewed to consider the opportunities and challenges associated with planning and implementing the requirements of the National Training Framework on a regional basis.

4. The scope of the National Training Framework.

Multiple questions regarding the scope of the NTF were received during the consultation. Respondents expressed an appetite for widening the scope beyond the relevant authorities named in the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 to non devolved organisations such as police, probation and the prison service and to organisations which may be sub-contracted to deliver some of the functions of the relevant authorities such as domiciliary care workers who work for private contractors or Registered Social Landlords. There was also significant appetite for the requirements of the guidance to apply to the Third Sector. Some concerns were raised that the NTF is based on risk or safeguarding thresholds. Also, a small group of respondents expressed concern that the NTF should apply to violence against women, domestic abuse and sexual violence, rather than domestic abuse.

The role of NHS Trusts and their place in regional rollout must be considered further in order to ensure that these organisations are engaged appropriately either as single organisations or within regional implementation and the good work already underway in these organisations is built upon.

“The training plan should take account of how local consortia engage with the wider public sector such as specialist NHS Trusts”. (Respondent 029)

Welsh Government response

The Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 applies to “relevant authorities”. In the Act, “relevant authority” means:

- (a) a local authority;
- (b) a Local Health Board;
- (c) a fire and rescue authority in Wales constituted by a scheme under section 2 of the Fire and Rescue Services Act 2004 (c.21), or a scheme to which section 4 of that Act applies;
- (d) a National Health Service trust established under section 18 of the National Health Service (Wales) Act 2006

The National Training Framework statutory guidance is issued under section 15 of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015. It is not possible for the Act (or the guidance) therefore to place requirements on anyone outside of these “relevant authorities”. However, as the guidance stipulates wider organisations are encouraged to engage in the Framework and implementation work to date has included organisations beyond the relevant authorities.

The NTF will not relate to risk as a basis for its application. The NTF is mapped against a victims journey through the Public Sector and groups 1 and 2, particularly, form part of improving earlier intervention and prevention. Risk and needs assessment are referenced in the content of some groups of the Framework in order to reflect common and accepted good practice in relation to service provision based on these assessments and to assist the relevant authorities decision making. This is not included to determine or exclude anyone from a service and the guidance will be reviewed to ensure this is clear.

The NTF does apply to the full breadth of the definitions of violence against women, domestic abuse and sexual abuse as outlined in the Act. This is reflected in the title and in the content of training developed under the Framework so far.

The roles of the NHS Trusts will be further considered and outlined in the revised guidance.

Ask and Act

Several respondents requested further detail regarding Ask and Act within the NTF.

There was some confusion amongst a small number of respondents between the regional training consortia and any training sub groups which are being set up locally to support implementation of the NTF.

A few requests were received for further guidance on the length of training required for “Ask and Act”.

Welsh Government response

“Ask and Act” is a large and detailed area of policy and in order to provide the requisite level of detail on this approach separate guidance has been published. This guidance is also open to public consultation until 27th January 2016. This guidance will address the comments received to this consultation.

Aligning Welsh Government legislation.

Some calls were received in the consultation response to ensure that at both central and local levels the requirements of the Social Services Act, the Violence against Women, Domestic Abuse and Sexual Violence Act and the Well-being Act were aligned. Such calls related particularly to mechanisms of implementation, including the significant training ask associated with the legislation.

“I would therefore welcome requirements for a child-specific training needs analysis to be contained in the statutory guidance and for this analysis to be informed by the child and young person elements of the population needs assessments and the local assessments of wellbeing, as required by the Social Services and Wellbeing Act 2014 and the Wellbeing of Future Generations (Wales) Act 2015 respectively”. (Respondent 050)

In a linked comment, one respondent called for a clearer outline of the role of the Care Council for Wales within the NTF.

Welsh Government response

The teams responsible for implementations of each Act are in liaison regarding potential integration and alignment of training activity related to each piece of legislation.

Implementation

Several respondents suggested that the 12 month rollout period for group 1 training was not long enough. No suggestions were received for a more suitable rollout period.

Some respondents were concerned that the 12 month eLearning rollout was the rollout period for the entire NTF (including Ask and Act). A small number of respondents commented on planning time for implementation and requested further clarification on how long they would have to plan.

Welsh Government response

The 12 months reference relates only to the group 1 training. The NTF rollout has an initial rollout phase of five years.

The time frame for planning and implementation will be further considered as the guidance is refined.

Capacity

The issue of capacity within the relevant authorities and within the specialist sector was raised during the consultation and this was particularly relevant to the consultation event. Concerns have been raised that there is limited capacity within relevant authorities to attend and deliver training, further hampered by similar training programmes which are being rolled out linked to other Welsh Government legislation and potential forthcoming funding cuts. There is also concern that groups 2 and 3 training which support “Ask and Act” will lead to demand on specialist services beyond existing capacity.

“I am supportive of the prudent approach taken to address the training requirements within this subject area and recognition of the importance of proportionality. However, it needs to be recognised that there are ever increasing demands placed on staff for more and more training coming from subject matter experts. Whilst not wishing to undermine this very important subject, there needs to be recognition that this is only one of a range of subjects that have training requirements. From an organisational perspective, it is essential that we consider these demands as a whole and look at the impact of them across the organisation from a staff perspective”. (Respondent 044)

Several respondents expressed support for integration of NTF implementation with that of the Social Services and Well-being (Wales) Act 2014 training programme. There were also calls to align the language associated with the Social Services and Well-being (Wales) Act 2014 with the language of “Ask and Act” and the NTF, such as the term “adult at risk”.

The role of the manager was referenced in several responses; particularly the role of Public Service line managers and their role in managing staff who disclose their own experiences of abuse following training. There were some calls that managers are prioritised for group 3 training in order to support staff appropriately.

Welsh Government response

The VAWDA team are in liaison with the teams implementing the overlapping training programmes to assess opportunities for integration to reduce the burden on the audience delivering against the legislation.

It is hoped that the pilot work related to this training and to the establishment of an infrastructure to support “Ask and Act” will lead to an enhanced understanding of what any increase in service need is and this learning will influence the development of the forthcoming guidance on commissioning which is being developed by the Welsh Government.

Prioritisation of staff training for groups 2 and 3 will be determined by the relevant authority and this should allow them to prioritise managers where necessary.

Specific feedback provided for each group of the Framework.

Group 1

Many responses linked the requirements for group 1 training to mean a requirement to complete the Welsh Government elearning. This is not the case and is an important point given some of the feedback provided below. One respondent suggested that additional resource would be required to ensure that all staff with FRAs could complete the elearning. However, this response was not replicated across other relevant authorities.

Several respondents called for the reach of the eLearning to be widened to anyone who wanted to complete it.

There was strong support for the elearning to form part of induction processes within the Public Service although some respondents raised concerns that this become nothing more than a “tickbox exercise” and that clear support for staff was available within each relevant authority following completion of the elearning.

Some concerns were raised that the technology of the relevant authorities was not able to support the elearning and that versions of the elearning should be created which met some of the additional needs of the relevant authorities. A small number of respondents requested that face to face training be used for group 1 where appropriate.

“E-learning assumes that all staff will have a sufficient level of IT literacy. This is not the case for some employees. Also not all staff have access to a computer”. (Respondent 012)

Closed captions are available on the elearning for those who cannot hear or do not have sound enabled on their machines and an audio book is also available for those who are visually impaired. Some respondents suggested

that the accessible versions be made more widely available. A hard copy workbook is also being developed.

A few respondents raised a preference for local monitoring of elearning completion, rather than centralised monitoring. This feedback was particularly relevant to those in DAC roles who felt that such monitoring was part of their roles and would form part of recording requirements made locally on them. Some DACs also raised a concern regarding access to the elearning on the All Wales Academy being hampered by a license agreement between the portal and the local authorities.

Welsh Government response

The Elearning is available on Learning@NHSWales which is technically accessible to all (it is also available on the All Wales Academy but this is less accessible outside of local authorities). However the Welsh Government accepts that accessing the elearning through this portal may feel unwieldy to the general public.

In order to make the eLearning available to a wider audience it would need to be placed on a public facing website. The Welsh Government are not currently in a position to do this. It is not possible through such an approach to monitor completion of the eLearning or enhance the wellbeing and safety checks inbuilt within the package. The Welsh Government will, however continue to assess the reach of the elearning and its placement and host.

The Welsh Government are in conversation with the All Wales Academy regarding the issues raised by the Domestic Abuse Co-ordinators and the guidance will be revised in line with the outcomes of these conversations. The guidance will also reference more clearly the alternative versions of the elearning which are available on all portals.

Group 2

Calls were made for a formal requirement to be made that refresher training at this level be outlined within the guidance.

One respondent highlighted the importance of ensuring those on relevant degrees (specifically social care in this example) were informed and aware of the legislation as part of this programme.

There were calls that community based organisations be included in the regional consortia. Similar (although less) calls were made in relation to the role of Registered Social Landlords.

Additional content on Multi Agency Risk Assessment Conferences was requested for the group 2 learning outcomes.

Welsh Government response

As the NTF and “Ask and Act” guidance outlines, the inclusion of specialist third sector organisations within the regional consortia is encouraged, especially in relation to group 3 which will rely on the expertise of the specialist third sector.

The developer contracted to develop the training for groups 2 and 3 on behalf of the Welsh Government will be provided with the responses to both the NTF and the “Ask and Act” consultations in order to use this feedback during the development of the training.

The Care Council for Wales has been engaged throughout the development of the National Training Framework and will continue to be as the guidance is further refined and the links between the NTF and the training linked to the Social Services Act are explored further.

Group 3

Calls were made for a formal requirement to be made that refresher training at this level be outlined within the guidance.

Additional content on Multi Agency Risk Assessment Conferences was requested for the group 3 learning outcomes.

Two respondents suggested that more content on children be added to the learning outcomes of group 3.

There was general support for the accreditation offered for group 3 trained professionals.

Some respondents suggested that group 3 training should be delivered prior to local rollout of group 2 training to ensure champions were in place to support the roll out of “Ask and Act” and managers were able to support any increased disclosures within the workplace.

Welsh Government response

The developer contracted to develop the training for groups 2 and 3 will be provided with the responses to both the NTF and the “Ask and Act” consultations in order to use this feedback during the development of the training.

The suggestion regarding the order of group 2 and 3 training will be shared with the contracted training developer for consideration in the “Ask and Act” pilot.

Group 4

One respondent called for volunteers to be included in the professional groups listed in group 4.

There was some suggestion that the requirements of group 4 of the NTF be built into national guidance relating to commissioning arrangements. A few questions were received in relation to the requirements for 35 hours CPD for this group of the NTF. Respondents have requested more clarification on what would comply as CPD and how this could be delivered. One respondent suggested that the credit value currently assigned to acceptable courses at this level be reduced to incorporate existing courses which are acceptable to their organisation. There were also a few calls for clarity that existing qualifications were acceptable at this level and that professionals already qualified to a suitable level would not have to re-train. A number of respondents suggested that more emphasis be placed on children and young people in this group and that children and young people's workers be included within this group.

One respondent suggested that training beyond the Safelives IDVA training be acceptable for IDVAs working in Wales and suggested that this was the case in England. They also suggested that courses beyond those funded for particular purposes by the Welsh Government be listed as acceptable for professionals in groups of the Framework.

Welsh Government response

Practice based feedback suggests that it is not uncommon for specialist workers to be provided access to a vocational qualification or course and for this to mark the end of their formal learning and development. Given the changing landscape of violence against women, domestic abuse and sexual violence service provision, legislation and policy this means that many practitioners may not have the opportunity to ensure they are up to date on changes affecting their work. This is not the case for other professions such as social work or midwifery where formal professional development is a requirement of that profession.

The parameters of the CPD requirement will be further considered in the revised guidance with additional advice provided. This will be considered within a context of compromised capacity within specialist services and flexibility will be considered carefully.

Those specialist workers already trained on one of the courses listed in the guidance would not need to retrain – their current training would comply with the guidance requirements on relevant authorities.

The Welsh Government will consider the credit value and course requirements at this level in line with the feedback received and the consequences relating to alternative courses beyond those funded by the Welsh Government in delivering a consistent Framework.

Group 5

Several responses highlighted the sensitivities experienced across the specialist sector in relation to commissioning and welcomed the peer support

element of this level, acknowledging a need for partnership and consortium working linked to commissioning and funding arrangements.

“The peer support network for managers is a specific area that should be supported. The competitive climate of commissioning and funding circles can be detrimental for relationships between service managers where they may not feel able to openly discuss difficulties and concerns. Group 5 training offers a possible safe and equal space where this support and sharing can be facilitated”. (Respondent 008)

A few respondents raised concerns that group 5 of the NTF related to domestic abuse services only.

There were some calls that group 5 training also be applied to wider managers working across the Public Service but not managing specialist services, and to commissioners. One respondent suggested that LCM qualifications be included for group 5.

Several respondents welcomed the inclusion and current provision of this training by the Welsh Government and requested that further funding is allocated to the delivery of the training beyond financial year 2015-2016.

Welsh Government response

The training for group 5 applies to anyone in a management or leadership role within a specialist service relating to any form of violence against women, domestic abuse and sexual violence. Uptake of training in this area to date would indicate that this is primarily domestic abuse and sexual violence services as specific services relating to other forms of violence against women are far rarer. The training at group 5 is co-developed and delivered by a domestic abuse charity (Safelives) and a sexual violence charity (New Pathways) and the feedback of learners indicates it is being very positively received. Feedback will be further monitored following training delivery during 2015-2016 and learning from this exercise will influence future delivery. The aims of group 5 of the NTF were not originally intended to apply beyond the specialist sector. The current focus of this group is acknowledging, validating and strengthening the leadership roles played within the specialist sector. Additional training needs of managers within the Public Service, more generally, will be met through group 3 of the Framework.

Group 6

Several respondents called for a more formal and targeted approach to group 6 of the National Training Framework to ensure that the aims of this group were more robustly addressed. Several calls for greater accountability of this group were received.

Many respondents acknowledged the role of leadership as key to the success of the National Training Framework and that the strategic engagement plan linked to the Framework was important. There were some calls that the National Safeguarding Board be included in the plan.

“Engagement with Group 6 professionals should be more targeted, and participation of leaders across public authorities should be monitored”.
(Respondent 048)

Welsh Government response

The Welsh Government will further consider how the Public Service leadership can be targeted and engaged effectively in the implementation of the NTF and will seek further advice on engaging relevant strategic forums. This will include liaisons with the National Adviser for Violence against Women, other forms of Gender-Based Violence, Domestic Abuse and Sexual Violence.

Specialist subject syllabus

There was strong support for the creation and ongoing development of the Specialist Subject Syllabus. Some respondents raised concerns that the syllabus could be too accessible and that the materials and outcomes be listed on the Live Fear Free website be restricted to only a select group of providers or “members”. One respondent urged that the creation of the syllabus should not impact on the income generation of the specialist third sector through training.

Welsh Government response.

It is not the intention of the Welsh Government for the existence of the Specialist Subject Syllabus to affect the income generation of the specialist third sector through training. It is hoped that the existence of the syllabus will add value to the training offer of this sector as the units listed on the syllabus are accredited and quality marked by the Welsh Government. The aim of the syllabus is to begin to create some consistency across localised training provision and to strengthen and formalise this offer for potential participants so it complies with CPD requirements.

Enquiries are being made regarding “members only” areas of the Live Fear Free website.