

## Response ID ANON-E1FC-QVQ9-G

Submitted to **A Consultation on the draft Delivery Plan for Equally Safe: Scotland's strategy for preventing and eradicating violence against women and girls.**

Submitted on 2017-06-30 13:32:09

### **PRIORITY 1: Scottish society embraces equality and mutual respect, and rejects all forms of violence against women and girls**

**1 Do you agree or disagree that the actions listed under priority 1 are the right actions to help meet the objectives of priority 1?**

Neither agree nor disagree

**2 Please tell us about any of the priority 1 actions that you are particularly supportive of.**

**Comments::**

In particular RCN Scotland supports action to increase public awareness around violence against women and girls.

**3 Please tell us about any priority 1 actions that you don't agree with.**

**Comments::**

**4 Are there any actions that you think are missing under priority 1?**

**Comments::**

RCN Scotland believes there are opportunities within some of the actions for this priority which could be expanded in order to better meet the objectives.

As part of the awareness raising action, better public understanding of the different forms of violence should be included.

As well as a prevention programme for boys and men, there should be a similar programme to help ensure that girls and women are also supported to understand and develop healthy relationships.

Under the section on childhood, and in keeping with recognition that school and education settings are key to young people developing healthy understandings of relationships, the role of key health professionals such as school nurses should be included. We are concerned that cuts to school nursing services in some areas could undermine the aspirations in this document for prevention.

RCN Scotland would also recommend that an action on supporting people who identify as trans or non-binary is included in this section, including within the action on bullying.

**Do you have any suggestions for additional actions to focus on?:**

### **PRIORITY 2: Women and girls thrive as equal citizens: socially, culturally, economically and politically**

**5 Do you agree or disagree that the actions listed under priority 2 are the right actions to help meet the objectives of priority 2?**

Neither agree nor disagree

**6 Please tell us about any of the priority 2 actions that you are particularly supportive of.**

**Comments::**

**7 Please tell us about any priority 2 actions that you don't agree with**

**Comments::**

**8 Are there any actions that you think are missing under priority 2?**

**Comments::**

Within actions to address occupational segregation, and as well the action to encourage women and girls to enter "male-dominated" career areas, RCN Scotland believes there should also be action to address the significant under representation in the uptake of certain college courses and modern apprenticeships by men and boys, as well the development of a strategy to encourage boys and men to undertake careers such as nursing which are currently dominated by women

**Do you have any suggestions for additional actions to focus on?:**

### **PRIORITY 3: Interventions are early and effective, preventing violence and maximising the safety and wellbeing of women, children and young people**

**9 Do you agree or disagree that the actions listed under priority 3 are the right actions to help meet the objectives of priority 3?**

Neither agree nor disagree

**10 Please tell us about any of the priority 3 actions that you are particularly supportive of.**

**Comments::**

RCN Scotland supports action to improve services for all victims of sexual assault who require forensic examination and we are pleased to see that the need to consider workforce planning is recognised.

RCN Scotland is also pleased to see action which aims to protect the wellbeing of vulnerable witnesses including children and young people through the use of pre-recorded evidence.

**11 Please tell us about any priority 3 actions that you don't agree with**

**Comments::**

**12 Are there any actions that you think are missing under priority 3?**

**Comments::**

Within this priority and the objectives, mental health and wellbeing should be explicitly mentioned.

We would recommend expanding the objective around access to services as follows; "Women, children and young people access and receive the appropriate care and support from effective and integrated services."

It is essential that actions to ensure early and effective interventions recognise the necessity of having the right workforce in the right place, with the right skills at the right time. The provision of adequate sustainable funding for these services should also be reflected within the actions.

RCN Scotland is glad that the need to develop and deliver sustainable training around gender based violence for public and third sector services is included in the actions. However, we believe this is too broad and should more specifically reflect that different professions within the public and third sector will require different levels or types of training in line with the type of service they will be expected to deliver in order to provide appropriate interventions which are effective in preventing violence and maximising the safety and wellbeing of women, children and young people. RCN Scotland would like to see an action which recognises the need for health care professionals to be appropriately supported to deliver care and support to all survivors of violence including recognition that staff's own mental health and wellbeing also needs to be supported particularly where situations or scenarios may trigger distress as a result of personal experiences of trauma.

All health and social care staff should feel confident and supported in raising concerns if they believe someone to be in danger or in need of safeguarding. Staff should be aware of and feel confident that there are clear pathways for referral.

Any standards which are produced must be done so with input from those delivering care and support and from those receiving care and support. Standards should be accompanied by robust guidance and a clear implementation strategy. So as not to duplicate frameworks RCN Scotland would encourage the Scottish Government to take account of pre-existing standards e.g. National Health and Social Care Standards.

This strategy for Scotland also needs to take into account the impact of decisions made at Westminster with UK wide application. Changes to child tax credits which were introduced in April 2017 by the Government, limiting child tax credit to the first two children, has the potential to further negatively impact the safety and wellbeing of women and girls who have experienced rape. The RCN has raised its concerns about this policy, including its potentially negative impact on the relationship between patient and nurse, midwife or health visitor. We do not believe that arbitrating whether a woman's claim is consistent with rape is an integral part of the role of the nurse or the midwife, as the requirement to provide a determination to the entitlement to this benefit is outside the normal therapeutic relationship, and requires healthcare professionals to make a very specific judgement call that would not ordinarily form part of their duties. To date, there has been no identification from government of the training and support to be offered to third party professionals to enable them to undertake this additional role.

**Do you have any suggestions for additional actions to focus on?:**

**PRIORITY 4: Men desist from all forms of violence against women and girls and perpetrators of such violence receive a robust and effective response**

**13 Do you agree or disagree that the actions listed under priority 4 are the right actions to help meet the objectives of priority 4?**

Neither agree nor disagree

**14 Please tell us about any of the priority 4 actions that you are particularly supportive of.**

**Comments::**

**15 Please tell us about any priority 4 actions that you don't agree with**

**Comments::**

**16 Are there any actions that you think are missing under priority 4?**

**Comments::**

While RCN Scotland fully understands the particular need to protect women and girls from male violence, in only focusing on men as perpetrators we are concerned that there is a risk of obscuring equally harmful violence against women and girls that is enacted by other women. Additionally RCN Scotland understands that this strategy is concerned with gender based violence as defined by the UN, however we do not wish to lose sight of key messages within our own guidance on violence and abuse which recognises that men may also be victims.

By only and repeatedly referring to men as perpetrators of violence against women, the strategy becomes overwhelmingly heteronormative and does not seek to represent and protect the interests of women who may be victims of violence within same sex relationships.

Additionally, by not acknowledging the potential for women to be perpetrators of violence against other women, the strategy obscures interfamilial abuse, where violence is perpetrated by one female family member on another.

Any priority which seeks to ensure that people desist from all forms of violence against women and girls should include robust action on seeking to rehabilitate perpetrators and ensure support is offered to families and communities to better understand what can cause and led to violence against women and girls as well as how to seek help and support in changing behaviour. Perpetrators of violence who may also have experience of trauma, addiction, or mental health problems should be supported to access appropriate care and support services.

**Do you have any suggestions for additional actions to focus on?:**

## **Cross cutting actions**

**17 Do you agree or disagree that the actions listed as cross cutting are the right actions to help meet the overall objectives of the delivery plan?**

Neither agree nor disagree

**18 Please tell us about any of the cross cutting actions that you are particularly supportive of.**

**Comments::**

**19 Please tell us about any cross cutting actions that you don't agree with.**

**Comments::**

**20 Are there any cross cutting actions that you think are missing?**

**Comments::**

RCN Scotland notes that the majority of the cross cutting actions belong to the Scottish Government. While we recognise the value of governmental direction, commitment and support - and the need for government agencies to lead and deliver some of this work - we also think the strategy could be strengthened if some of these actions invited participation and engagement from wider civic society where appropriate, including third sector organisations and/or advocacy groups. The strategy and the actions which lead to its delivery should, as much as possible and as much as appropriate, be done in partnership with people who have lived experience of the issues including those with experience of providing care and support to survivors of violence. As an example, the action to develop multi-agency national guidelines for tackling female genital mutilation must be done in partnership with communities affected by FGM as well as representatives from the agencies involved in protecting, caring for and supporting people at risk of, or who have experienced FGM.

RCN Scotland believes that within the cross cutting actions there should be an acknowledgment that there are some demographic groups who, because their interests are often overlooked in wider society, may be particularly vulnerable to violence against women. This may include people who identify as trans or non-binary, people from travelling communities, people with refugee status, people who are homeless, people who are in prison, people who are in detention centres etc.

Within the Scottish context it is also highly important to recognise that the needs of people living in remote and rural areas are accounted for. Specific actions should be developed to address the particular challenges which may be faced by women and girls in these circumstances.

**Do you have any suggestions for additional actions to focus on?:**

## **Performance Framework and Indicators**

**21 Do you agree or disagree that the draft performance framework is right to help ensure that we understand the progress we are making?**

Neither agree nor disagree

**22 Please tell us about any sections of the draft performance framework that you are supportive of**

**Comments::**

**23 Is there anything you think is missing?**

**Comments::**

Professionals and others providing the services which mean interventions are early and effective in preventing violence should be included in the Target Group for this priority.

Many of the issues raised in our early response apply to the framework and indicators. The same exclusive focus on men as perpetrators of VaWG is again evident. Additionally there are no indicators to specifically capture the needs of traditionally marginalised groups.

It is necessary to provide further details on how baselines for measurement will be set and for further details to be shared around how it is proposed robust, reliable data can be collected for measurement of improvement in an area that we know goes under reported.

In any discussion of standards and measuring frameworks it is important that the strategy takes account of pre-existing standards and measurements beyond this particular strategy e.g. National Health and Social Care Standards. Additionally, the government should be cognisant of not unnecessarily adding to the burden of data collection but focus on measurement frameworks which can complement and contribute to a cross cutting lean and focused improvement agenda.

**24 Do you have any suggestions for additions to the draft performance framework?**

Comments::

**Questions for Groups & Organisations**

**25 What role could your organisation have in contributing to this delivery plan?**

Comments::

RCN Scotland supports members working in health and social care to provide safe, effective, high quality care to all service users.

We have offer professional guidance for members on a number of the issues raised by this strategy including domestic abuse, female genital mutilation, safeguarding children and young people and modern slavery.

**26 In responding to this consultation, how are you drawing on the experiences and views of the women, children and young people who access your organisation?**

Comments::

**27 Do you have any further comments on the delivery plan?**

Comments::

**About You**

**What is your name?**

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**Are you responding as an individual or an organisation?**

Organisation

**What is your organisation?**

Organisation:

Royal College of Nursing Scotland

**The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:**

Publish response only (without name)

**We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?**

Yes