



GOVERNMENT OF MALTA

Government response to the consultation on ‘The Social Regulatory Standards for Domestic Violence Community-Based Services’

03.09.2020

Ministry for the Family, Children's Rights and Social Solidarity
310, Palazzo Ferreria
Republic Street
Valletta VLT 1110

This publication (excluding Logos) may be re-used free of charge in any format or medium provided that is re-used accurately and not used in a misleading context. This material must be acknowledged as Government of Malta and the title of the publication specified.

Any enquiries regarding this publication should be sent at onlineconsultations@gov.mt.

Published by the Ministry of *(insert the Ministry's title)*

Contents

CONTENTS

Contents.....	3
Executive Summary	4
Introduction and overview	4
Responses to the consultation and process used to seek stakeholder views	4
Summary of responses and decisions.....	5
Implementation.....	16
Contact Details	17
Detailed overview of responses and the Government’s response.....	17
Question 1 : <i>insert the question (only if your Ministry decided to list a set of questions for the public to leave their feedback)</i>	17
Annex A: List of respondents (<i>optional</i>)	19

Executive Summary

Introduction and overview

1. A brief introduction about the subject.

The Social Regulatory Standards for Domestic Violence Community-Based Services are aimed at establishing the level of service expected to be delivered by service providers in the field. These guide decision-making practices in various aspects of service provision mainly the sufficiency of community-based services, workforce competence, and the management of the service. These social regulatory standards are based on the basic principles of dignity, privacy, right for choice, safety, realising potential, equality, individuality, and diversity.

2. The public consultation date.

Include the objective and purpose of the public consultation.

On the 2nd of July 2020, the Government launched two sets of Social Regulatory Standards for Public Consultation. The purpose of this public consultation was to receive feedback from the general public on Domestic Violence Residential and Community-Based Services. The Social Care Standards Authority aims at having a comprehensive and extensive public consultation that reaches different professionals, staff working in settings offering services in the field of domestic violence, individuals who have availed or are availing of services in the field as well as relatives of these persons, and other persons who are interested in the subject matter.

3. This consultation sought views on:

- Guidelines for Domestic Violence Community-Based Services. Seven standards were identified addressing: Intervention Procedures, Individualized and Holistic Service Planning, Rights and Empowerment, Safety and Security, Safekeeping and Dissemination of Information, External Relations and Collaborations, and Service Quality Management.

Responses to the consultation and process used to seek stakeholder views

This document is the Government Response to this consultation and sets out the Government's decisions on these matters.

4. The closing date of the public consultation. Which methods were used to receive the feedback?
The total amount of responses. From whom you received the feedback?

This consultation closed on the 3rd of August 2020. The consultation documents were available online and responses were accepted electronically, on paper, by phone, or through one-to-one meetings upon request. In total, there were circa **244** comments on different aspects of the

standards. Kindly refer to Annex A for the full list of respondents who have submitted their feedback on this set of Standards.

5. Include (if any) meetings with stakeholders and list who the stakeholders were.

Feedback was gathered from service providers in the field, namely Dar Merħba Bik, Fondazzjoni Sebħ, St Jeanne Antide Foundation, Victim Support Malta, Agency Appoġġ, and also from the Commission on Gender-Based Violence and Domestic Violence during orientation meetings held individually either through a personal meeting or through video conferencing.

Summary of responses and decisions

The following is a summary of the consultation responses received. We would like to thank all those who took the time to respond to the consultation and participate in stakeholder meetings around the consultation exercise.

6. Statistics.

- Total feedback received: 14
- Total feedback received by individuals: 5
- Total feedback received by organisations: 9
- Total feedback received through email: 14
- Total feedback received through online form: Nil
- Total feedback received by post: Nil

7. Summary of feedback received.

The majority of respondents expressed the need to ensure high quality services for victims of domestic violence.

Eighteen percent of all received comments (44 comments) were either general comments about the standards or feedback attributed directly to the principles on which the standards are based, the glossary or general terminology.

Amongst the general comments, respondents pointed out:

- The need to include a gender-based perspective on domestic violence as established in the Istanbul Convention which states that domestic violence is often a form of gender-based violence on women, rooted in the historical power imbalance where men hold more power than women in most spheres of life. Also, 'Gender-based Violence' and 'Domestic Violence' are both safeguarded by the same Legal Act in Maltese Law.
- The concerns emanating from financial problems that can make it more difficult for service providers to meet the required standards therefore suggesting that payments issued by the government and PSP agreements are to be reviewed accordingly.
- The need to adjust terminology to include gender queer individuals. Significant feedback was also received in particular on the list of characteristics that individuals shall not be discriminated against which shall include political affiliations and skin colour, amongst others, as suggested.
- Useful reference material that can be added with the reference list in Annex 5.

- The need for greater collaboration between service providers and the Commission for Gender-Based Violence and Domestic Violence to ensure that service provision, including campaigning and training, continues to evolve around the needs of victims of violence.
- The concern when it comes to identifying real victims and pretend victims where there might be the possibility of ‘pretend’ victims to abuse of the system by availing of such services with the intention of getting child custody, for example.
- The need for a Social Impact Assessment process that should take place in parallel with standard formulation. As a response to this, the SCSA undertakes Social Intelligence Exercises which aim at collecting useful insights on service quality amongst others through collaboration and dialogue with professionals, relatives, service users, service providers, and staff in the field.

Some of the feedback was directly related to the glossary of which amendments were suggested to the following terms: ‘competent person’, ‘dependent person’, individual representative’, ‘key worker’, ‘staff’, ‘helpline’, ‘service provider’ and ‘volunteers’. Additionally, the terms ‘discrimination’ and ‘gender-based violence’ will be introduced as part of the glossary.

With regards to ‘principles’ amendments were suggested to the following aspects:

- To amend the list of characteristics of what shall constitute to equal treatment (this will be accounted for in the next section below).

Most feedback was attributed to the content of the standards and annexes. More than 27% of all feedback received for this set of standards directly relates to Standard 1 which constitutes aspects of service provision that revolve around fairness, transparency, accessibility, and comprehensiveness in service delivery to be able to respond to evolving needs of individuals who avail of such services. This standard includes aspects such as accessibility and awareness of services and the availability of a helpline and/or chatline service.

Standard 1 – 67 comments (Effective and Respectful Intervention Procedures) amongst which include aspects related to:

- The need to reach out to persons living within residential services in the community such as old people’s homes,
- The need for standardised modes of answering queries and concerns when assisting individuals through a helpline/chatline,
- The need to ensure that a fair and appropriate service is provided through the helpline/chatline by training staff members to focus on challenging gender stereotypes,
- Assessment tools which should be assessed and analysed,
- Assessments which should be built gradually through an active, ongoing, and spiral process rather than a one-time development of a document,
- Providing the perpetrator with a fair chance of an assessment,
- Acknowledging receipt of a referral for a community-based service once a referral is received,
- Terminology which should address gender queer individuals thus not limiting gender to men and women only,
- Support which shall be given for as long as it is required by the individual,
- Providing rapid response which may be affected by the extent of disclosure from those seeking the service and also the assistance of other relevant entities such as the police,
- Accessibility of services to individuals such as legal aid even when there are no financial means from behalf of the individuals,
- Disseminating reliable and updated information, including information delivered through a helpline/chatline,

- The importance of empowerment and self-determination of individuals,
- The importance of safety planning and informal support networks as protective factors that lead to risk mitigation however always respecting decisions taken by individuals unless these are harmful to themselves or others,
- Displaying of posters on domestic violence services in different buildings for increased awareness and access amongst the general public.

Standard 2 – 36 comments (Individualized and Holistic Service Planning) amongst which include aspects related to:

- The policies and procedures that individuals availing of the service need to adhere to which shall be explained once they access the service,
- The policies and procedures to be followed by the staff and management which shall be exclusively developed separate from the general rules and regulations that need to be adhered to by both staff and individuals availing of the services and so ensuring that any kind of documentation shall be made accessible and explained in an adequate manner to whoever it is entitled to,
- The need to be clear as to who should act as the independent representative as there might be the risk of this person being the abuser,
- The unfeasibility to provide additional services to cater for requirements to address impairments or illiteracy when it comes to interpreting information,
- The involvement of individuals, as much as possible, when developing personal support plans and service agreements.

Standard 3 – 40 comments (Rights, Self-Empowerment and Wellbeing) amongst which include aspects related to:

- The challenge for NGOs to offer support to children accompanying individuals due to issues of care, custody, and consent,
- The difficulty of changing the key worker in cases where there would only be one key worker,
- Aspects of vulnerability amongst children accompanying individuals,
- The importance of ensuring consistency when providing information without undue delay and bias.

Standard 4 – 17 comments (Safeguarding Safety and Security) amongst which include aspects related to:

- The need for health and safety risk assessments to take place and to ensure that new health and safety regulations are implemented and monitored,
- The accessibility of community-based centres,
- The need for ongoing quality assurance to improve service provision and safeguard the safety of all individuals.

Standard 5 – 10 comments (Handling and Safekeeping of Data and Information Dissemination) amongst which include aspects related to:

- Serious concerns amongst NGOs working with victims in terms of client and staff safety and liability when acquiring information on perpetrators,
- The appropriate use of terminology – substituting the term ‘discharge letters’ with ‘termination forms’.

Standard 6 – 9 comments (Interagency Collaboration and External Relations) amongst which include aspects related to:

- The concern amongst NGOs with regards to the struggle to raise funds to pay salaries and provide services whilst ‘competing’ for funds with all other NGOs working in different sectors due to not having a specialised fund supported by the state that caters for services in the field of domestic violence,
- The need for the informal networks of support to be assessed as these may potentially be harmful to the victims and therefore their involvement should only be due when necessary,
- The need for increased promotion of programmes and activities that empower women,
- Collaborations made with other entities for the benefit of the children which shall take place through the parent that the child is accompanying thus empowering the same parent to work through child related matter, except in instances where the service provider’s intervention might be requested.

Standard 7 – 10 comments (Service Quality Management) amongst which include aspects related to:

- Specific training on domestic violence which shall be provided to staff including staff who assist individuals through a helpline/chatline.
- The need for all staff to be duly vetted to ensure a clean criminal record in relation to violence,
- Ensuring that both volunteers and staff are adequately supervised with clear lines of accountability,
- The need to evaluate and compare different methods of intervention adopted by staff.

Annex 1 – 1 comment

Annex 2 – 1 comment

Annex 3 – 1 comment

Annex 4 – 7 comments

Annex 5 – 1 comment

8. Your assessment and the Government’s decision (list the Government’s decisions).

The below is an account of the major proposed amendments after analysing the feedback gathered during the public consultation period. A significant number of amendments being proposed revolve mostly around terminology.

The statement at the beginning of the guidelines relating to masculine and feminine nomenclatures will be removed since the content of the standards is written in a gender-inclusive language and such statement might indicate otherwise.

With regards to the glossary, the following changes will be due:

‘Competent person’ – to replace ‘theoretical’ with ‘qualifications’.

‘Dependant Person’ – to replace the term ‘dependant’ with ‘vulnerable’ and amend as follows: Vulnerable persons may be children, persons with disability, persons with mental health problems, and older persons amongst others who might also be victims of domestic violence and who rely on the support given by the individual experiencing domestic violence seeking support from community-based services.

‘Helpline’ – to remove ‘24/7’ from the definition (Also one should always keep in mind that there is the 179 helpline which is available on a 24/7 basis). Also, to include the term ‘email’ as a means of communication.

‘Independent Representative’ – To amend definition as follows: means a person who is independent from any aspect of the service and from any agency involved in the provision of service, working in the name of the person availing of the service or in his/her/their interest. The representative shall carry out such work after being appointed following a formal selection process that ensures the protection and safeguarding of the individual in whose name the said representative is acting as stipulated by law, such as in the case of guardianship or curatorship.

‘Key worker’ – the term ‘action plan’ in such definition shall be replaced by ‘personal support plan’.

‘Persons who experience domestic violence’ – shall be substituted with ‘individuals who experience gender-based and/or domestic violence’ throughout the entire document.

‘Personal Support Plan’ – the definition of Personal Support Plan shall read as follows: *means a document that is based on a holistic assessment of the individuals that specifies how the individuals’ needs and aspirations are going to be met. It also includes the resources required to fulfil such plan.*

The rest of the definition shall be omitted since the service provider usually works with the adult victims of DV whilst children are usually assisted through their parents and in collaboration with other services when necessary such as school counsellors, Child Protection Services, etc. The challenges of consent would not usually allow the service provider to work with the children directly.

‘Service Provider’ – To amend as follows: means a person or an organisation that provides support through a range of services offered to individuals **and families**.

‘Staff’ – to replace the term ‘rules’ with ‘policies’ in the definition of ‘staff’

‘Volunteers’ – to add this statement with current one: Volunteers shall follow the same code of ethics and code of practice as the rest of the staff working in such services.

The term ‘discrimination’ shall be added to the glossary, as defined in the Equality for Men and Women Act (Cap.456).

The term ‘gender-based violence’ shall be added to the glossary, as defined in the Gender-based Violence and Domestic Violence Act (Cap. 581).

General Terminology

The list of personal characteristics which individuals must not be discriminated against shall be used in a consistent manner throughout the guidelines. Since the list is relatively long, this list can be mentioned once, and reference shall be made to this list whenever required. The characteristics noted down in bold have been introduced to the list following feedback received. Individuals shall not be discriminated against on the basis of sex, sexual orientation, age, race/ethnic origin, **social origin, civil and socio-economic status, colour**, religion/belief, gender identity, gender expression, sex characteristics, **genetic features**, language, **nationality, political opinion, property**, family responsibilities, **pregnancy**, health including mental health status and physical, intellectual, sensory, or social abilities.

The term ‘elderly’ shall be replaced throughout by the term ‘older persons’.

Whenever the possessive determiners ‘his’ or ‘her’ are used, the possessive determiner ‘their’ should be added as well to include gender queer individuals.

Also, the term ‘alleged’ shall be used prior to the term ‘perpetrator’.

Any reference made in the document to ‘persons who experience domestic violence’ shall be substituted with: ‘individuals who experience gender-based and/or domestic violence’.

Amendments to Standard 1:

P.I. 1.3 shall be amended as follows: Efforts shall be sustained to reach out to individuals in hospitals including mental health facilities or those receiving mental health care, rehabilitation centres, **residential services**, ethnic minorities, migrants, asylum seekers, persons with disabilities, older persons, the LGBTIQ community, and persons involved in prostitution amongst others.

To insert new P.I. after P.I. 1.4 that reads: Posters and flyers with information about available support services in cases of domestic violence shall be exposed and disseminated within the above-mentioned entities and centres.

P.I. 1.5 shall be amended to read as follows: When developing educational, outreach, prevention, community, or residential services efforts shall be made to avoid stereotypes and other misinformed assumptions related to gender whilst encouraging all members of society including children to contribute actively to prevent all forms of violence and abuse.

To add another P.I. after 1.5 that reads: Any teaching material being used shall be adapted to all educational levels both in formal and informal educational settings.

P.I. 1.6 shall be amended to read: Outreach and educational programmes shall be developed to increasingly expose the dynamic nature of domestic violence including different forms of how it can be manifested and the different impacts it has on men, women, and children.

To amend P.I. 1.10 to read as follows: If support services are offered to the alleged perpetrators, it shall be ensured that they are given enough time to express themselves whilst ensuring that the safety and wellbeing of the affected victims is not put at stake, together with the safety of the staff operating in such settings and also the safety of other individuals receiving services.

P.I. 1.11 shall be amended as follows: The management shall identify social and cultural patterns, strengths, limitations, and barriers of access to services and commit to analyse and propose solutions to address specific geographical requirements through proper data collection, processing and analysis.

To remove '24/7' from Quality Indicator 2.

To include 'residential services' with P.I. 2.1.

P.I. 2.2 shall be amended as follows: Such services shall be professionally and ethically delivered thus staff recruitment, training and supervision shall be carried out effectively and duly to ensure that anyone who makes contact through such means receives the right services.

To add another P.I. after 2.6 that reads: Staff shall engage in specialised training to detect issues or situations of crisis to be able to understand and communicate well with persons who try to access the service.

To add a new P.I. after 2.9 that reads: Staff shall keep a record of the questions asked as well as the replies given to ensure a standardized way of answering to queries/concerns.

To amend P.I. 2.10 to read as follows: Regular monitoring and evaluation of the helpline and chat-line services shall be due to determine whether individuals' requests are being addressed with immediate effect and also to check the technical aspects of operating such services.

To amend P.I. 3.1 to read: Service provision shall be sustainable and able to provide support and care for as long as is required without creating unnecessary dependency.

To add a new P.I. after 3.1 that reads: There shall be awareness on the gendered nature of domestic violence thus develop services that are gender-specific.

P.I 3.4 to add: as far as the operational procedures of the community-based services are involved.

To add P.I. after P.I. 3.5 to read: Assessment tools shall be revised and updated following research and evidence-based practices and the necessary training shall be provided to staff undertaking such assessments.

P.I. 3.7 shall be amended as follows: Once a referral is received, the service provider shall acknowledge receipt of the referral and the source of referral shall be informed about the processing of the application.

This P.I. shall be followed by a P.I that states that: If an acknowledgement letter is issued upon a request for service, all necessary precautionary measures shall be taken to ensure that this is received by the individual that it is addressed to.

P.I. 3.9 shall be amended as follows: During the initial discussion the staff shall, with immediate effect, assess whether the safety of the individuals or significant others is at stake, as much as it is possible to do so, so as to prevent further incidents from happening.

To amend P.I. 3.16 to read: Service provision shall revolve around personal autonomy and self-determination, thus focusing on enhancing the strengths and bolstering the resilience of individuals and supporting their life choices as far as these do not put them or others at risk.

To add 2 new Performance Indicators (P.I.) following P.I. 3.16 that reads: A safety plan shall be drawn for every individual availing of the service with the contribution of the same individual, the appointed key worker and the interdisciplinary team if and as required.

The safety plan shall also identify informal support networks all of which shall be considered as protective factors that contribute to risk mitigation.

Amendments to Standard 2:

P.I. 1.2 shall be amended as follows: Once accepted into the service, the individuals, or their representatives shall be, **as much as possible**, involved in developing the details of the service agreement to which they agree.

To add P.I. after 1.2 that shall read: The service agreement shall be developed after individuals are assigned a key worker who will guide and assist the individuals accordingly when such agreement is being developed.

P.I. 1.3 shall be amended to read as follows: The individuals, or their representatives, shall be provided with a dated copy of this written service agreement at least in both Maltese and English and which both themselves and the service provider sign.

To add a P.I after 1.3 that shall read: In case the individuals refrain from signing the service agreement, the key worker shall provide an explanation on why this is required and shall answer any questions that the individuals might have.

P.I. 1.6 to be divided into 2 separate P.I.s to read as follows: The service agreement (both the original and any subsequent updates) shall specify the terms and conditions of the service, which shall be fulfilled accordingly as per the specific type of service offered.

P.I. 1.7: The depth and comprehensiveness of the service agreement shall be largely determined by the type of service availed of and the needs of the individuals.

To amend P.I. 1.8 as follows: The service shall be terminated or extended in partnership with the individuals bearing in mind their safety, needs, expectations and best interest. **The service agreement in place shall be revised accordingly.**

P.I. 1.9 shall be amended as follows: The service shall have documented policies and procedures which shall guide the staff and management in their daily work which shall be accessible to them and documented in a manner which the staff and management can both understand.

A new P.I. shall be added following P.I. 1.9: The service shall also have documented policies and procedures that apply to the individuals availing of the service of which they shall be aware of and shall adhere to.

P.I. 1.10 shall be amended as follows: The staff shall read, explain, and help the individuals understand the regulations, policies, and procedures that they need to follow whilst accessing a community-based service.

To amend P.I. 2.1 as follows: Planning of services shall be established upon the principle that the individuals shall assume their right to control their lives as much as possible, if they are able to do so **without putting themselves, the staff working with them or significant persons in their lives at risk.**

To amend P.I. 2.2 to read: An independent representative may be appointed to provide support in situations where personal autonomy and self-determination may be limited.

To include 'homophobia' and 'transphobia' with the examples mentioned in P.I. 2.4. and replace 'other sorts of discrimination' with 'discrimination due to intersectionalities'.

P.I. 2.5 to amend to: The key worker shall keep regular contact with the individuals and with all those involved in providing support.

P.I. 2.6 to be divided into 2 separate P.I.s to read as follows: The personal support plan shall be developed together with the individuals and any decision and information pertaining to the individuals shall be recorded in such plan.

P.I. 2.7: The depth and comprehensiveness of the personal support plan is largely determined by the type of service availed of and the needs of the individuals.

To add a P.I. following 2.7 to read: The personal support plan shall be treated as a flexible plan that is subject to reviewing and is amended accordingly from time to time depending on the individual's needs.

To amalgamate P.I. 2.10 and P.I. 2.11 to read: The personal support plan shall be available at least in Maltese and English of which a copy shall be provided unless there are undue safety risks in doing so. Such plan shall always be made available if the individuals request it at any point in time.

To add P.I after the above to read: The individuals shall be supported to understand their personal support plan.

P.I. 2.11 shall be amended as follows: The individuals shall sign their plan and shall understand subsequent amendments done to such plan during the period of service provision.

Amendments to Standard 3:

To amend P.I. 1.4 to read: The individuals shall be continuously consulted when organizing activities and programmes as an empowerment tool so that service provision continues to evolve around those needs and issues of concern that the individuals are truly confronted with from time to time.

To remove 'religion or faith' from P.I. 1.6.

Quality Indicator 2 shall read: The service provider shall ensure that any information is delivered in a timely, complete, and suitable manner for the individuals who experience domestic violence to understand.

To amend P.I. 2.1 to include that: Any information delivered shall be free from any bias or agenda.

To amend P.I. 2.3 to read: Information shall be made available on all possible options and rights that the individuals and vulnerable persons close to them may be entitled to, be them legally, financially, socially, culturally, or medically related, amongst others, if there is a request for such information.

To amend P.I. 2.6 to read as follows: The individuals shall be provided with information related to therapeutic services such as family therapy both those offered in-house and those offered outside the service.

To add a P.I. after 2.6 to read: The individuals are informed of the professionals' legal obligation to involve the police to ensure their safety if it is perceived that they are in imminent danger in order to ensure their best interest and wellbeing as well as that of any vulnerable persons, if present.

To add the terms 'no stereotypes and gender bias' to the term 'non-violence' in P.I 3.1.

To add another Performance Indicator following 3.6 that reads: In case there is only one key worker, the individual shall be given the opportunity to be referred to other services if this would be more of benefit to the same individual.

After P.I. 4.4 to include another P.I. that reads: If individuals have no financial means, they should still be offered and supported to access free Legal Aid.

P.I 4.5 shall be amended as follows: The individuals shall be given all the required support to decide on whether or not to file an official police report with the ultimate decision to be always of the individuals except in cases where life threatening and imminent danger is present and therefore professionals are duty bound to report for the best interest of the individuals.

To include financial assistance with the examples in P.I. 4.6.

To add with P.I. 5.2 – especially when there are additional vulnerabilities.

In P.I. 5.6 – it shall be noted that consent forms shall be available in both Maltese and English, and to be signed by the parent that the child is accompanying.

Amendments to Standard 4:

To amend P.I. 1.2 to read: Community-based centres shall be accessible for everyone, however in case of problems related to accessibility, arrangements can be made so that service provision can be offered from alternative sites that are accessible following arrangements with other entities.

With P.I. 1.5 to add: thus, the necessary health and safety checks shall be due as required.

To move P.I. 1.7 regarding risk assessments and safety planning to Standard 1 Quality Indicator 3 on Safety Planning.

To amend P.I. 2.4 to read: The management shall acknowledge all concerns and complaints put forward by the individuals and other persons, and give account of proceedings and outcomes of investigation as part of ongoing quality assurance whilst ensuring that remedial action is taken in due time.

Amendments to Standard 5:

An addendum shall be made to P.I. 1.3 to read as follows: Any personal information pertaining to the individuals availing of the service and **working staff** shall be processed according to the law on Data Protection and the GDPR.

Performance Indicator 1.4 relating to perpetrators shall be omitted.

To add a P.I. following 1.5 that reads: Any information being shared on behalf of the individuals and staff shall be recorded and processed according to the law on Data Protection and the GDPR.

P.I. 2.4 shall be amended to: There shall be absolute commitment by all the staff and the management to adhere to respective laws and regulations when it comes to **the sharing, processing, and retention** of data such as progress reports, termination forms, case notes, and case reviews, amongst others.

Amendments to Standard 6:

Quality Indicator 1 shall be amended as follows: The service provider shall be in contact with significant persons close to the individuals who experience domestic violence only if it is necessary and if this does not put the individuals in any kind of danger

To amend P.I. 1.2 as follows: The staff and the management shall be able to understand the relationship that exists between the individuals and their families or significant others so as to determine whether these can be of support for the individuals without putting the safety of the individuals in danger.

P.I. 1.4 shall be amended as follows: The staff shall respect significant persons close to the individuals, value the opinions of these persons, acknowledge their expectations of the service and provide information on how their concerns or comments will be dealt with if this is in the best interest of the individuals availing of the service.

To amend P.I. 2.5 to read: Individuals with children shall be supported to collaborate with schools, training institutions, and educational programmes so that children continue to receive education, quality tuition, and have access to resources just like any other child their age.

To remove reference to 'child protection' in P.I. 2.6.

To amend P.I. 2.9 to read as follows: The individuals shall be supported to understand that in some instances it may be useful for child protection authorities to intervene whilst ensuring that the same individuals are given the chance to take decisions in the best interest of their child, **if it is appropriate to do so.**

To add a P.I. following P.I. 2.9 to read: For the safety of children involved a referral to child protection services may be due, sometimes even without the consent of the parent, to safeguard the best interest of the child.

To add a P.I. after P.I. 2.10 that reads: Active communication and collaboration with the Commission on Gender-based Violence and Domestic Violence shall be sustained.

To amend Performance Indicator 2.14 to read: Information shall be acquired on state and EU funded schemes that may offer financial aid to develop new or existent programmes and services.

Amendments to Standard 7:

P.I. 1.3 shall be amended to read: Service coordination and general operational functions shall be carried out ethically and sensitively.

To add a P.I. following P.I. 1.4 to read: The management and staff shall be able to compare and evaluate the methods being used in their daily practice whilst remaining up to date with methods and tools used abroad.

P.I. 1.7 – to omit all examples as these are already included in a thorough list as mentioned above (the list of personal characteristics which individuals must not be discriminated against).

P.I. 1.16 shall be amended as follows: The staff, especially that who makes the initial contact with the individuals, shall be trained to recognise any signs of domestic violence or any other abuse, **be aware of intersectionalities and contextual factors**, and be able to take the necessary actions using safe and tested measures.

To add supervision of volunteers with staff supervision in P.I. 3.3.

P.I. 3.5.1 shall be amended to read: the staff and volunteers are more aware of and are non-judgemental towards individuals and children in any aspect of their personal life as stipulated in Standard 1 Performance Indicator 3.8 (which is the list of characteristics that individuals shall not be discriminated against);

P.I. 3.6 shall be amended as follows: The staff shall be given specialised and up-dated training when it comes to detecting violence, dealing with trauma, conducting risk assessments, and preventing secondary victimisation, amongst others.

Annex 1 point iii, shall be amended to: contact details of other useful services such as the Social Care Standards Authority, **amongst others**.

Annex 2 point ix, shall be amended to: information about any **physical or mental** health condition of both the individuals and children (if present) that might affect service provision.

Annex 3 point i (vi) to substitute healthcare and medical assistance with physical and mental health. To add employment support and educational needs with point (ix). To add budgeting skills with the list.

1.2 Annex 4: Manual of Policies and Procedures: 1.3 to include:

Contact with Service

1.3.1 First time contact with service

1.3.2 Re-accessing services

1.3.3 Termination of services

1.3.4 After-care services

Annex 4: 1.14 to add 'protection of other vulnerable persons' with 'child protection'.

Annex 4: 2.3 To add Selection Process with Recruitment.

Annex 4: 3.5 To replace 'Injuries' with Accidents and Incidents and add 'harm to third parties' as a sub-clause.

Annex 4: To add clause 4.5: Mental Health Emergency.

Annex 5: To add the following reference as part of the useful reference material:
https://avp.org/wp-content/uploads/2017/04/ncavp_poc_ipvtoolkit.pdf

Implementation

9. When you intend to implement the decisions

In the coming weeks, all necessary amendments to the guidelines and legal notices will be made. The legal notices are expected to be approved by Cabinet and the SCSA will then launch the final draft.

Contact Details

If you have any questions regarding this response, please contact: regulations.scsa@gov.mt

Detailed overview of responses and the Government's response

The following section provide a brief summary of the initial proposals and the responses received, before setting out the final decision that has been made. *(Standard text)*

Question 1 : *insert the question (only if your Ministry decided to list a set of questions for the public to leave their feedback)*

Eg:

Question 1 : Do you agree

Consultation Proposal

1.1 We said in our consultation document that.....

Q1 Responses	
Agreed	7
Disagreed	12
Indeterminate	16
No comment	30

1.2 A significant majority of respondents (71%) either did not answer this question or were unable to express a clear opinion either way, mainly because they had insufficient knowledge on the subject to make a definitive judgement.

1.3 Among the respondents who agreed with our projections, it was commonly cited that..... Others, while disagreeing with our proposal, accepted that

Post-consultation analysis / Final decision

1.4 Having considered the challenges to our projections, our assessment remains that....

1.5 We have considered very carefully the arguments presented on both sides of the question. We acknowledge that



Annex A: List of respondents (*optional*)

Organizations (in no particular order):

Human Rights Directorate – Ministry for Justice, Equality and Governance
Office of the Commissioner for Mental Health
Fondazzjoni Sebħ
St Jeanne Antide Foundation
Victim Support Malta
Dar Merħba Bik
Commission on Gender-Based Violence and Domestic Violence
National Commission for the Promotion of Equality
Agency Appoġġ

Individuals (in no particular order):

Ms Beverley Abela
Dr Maria Aurora Fenech
Dr Marcelline Naudi
Mr Brian Chircop
Dr Michael Briguglio