



WLGA and ADEW Consultation

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Welsh Government Period Dignity Strategic Action Plan

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Welsh Local Government Association - The Voice of Welsh Councils

We are The Welsh Local Government Association (WLGA); a politically led cross-party organisation that seeks to give local government a strong voice at a national level. We represent the interests of local government and promote local democracy in Wales.

The 22 councils in Wales are our members and the 3 fire and rescue authorities and 3 national park authorities are associate members.

We believe that the ideas that change people's lives, happen locally.

Communities are at their best when they feel connected to their council through local democracy. By championing, facilitating, and achieving these connections, we can build a vibrant local democracy that allows communities to thrive.

Our ultimate goal is to promote, protect, support, and develop democratic local government and the interests of councils in Wales.

We'll achieve our vision by

- Promoting the role and prominence of councillors and council leaders
- Ensuring maximum local discretion in legislation or statutory guidance
- Championing and securing long-term and sustainable funding for councils
- Promoting sector-led improvement
- Encouraging a vibrant local democracy, promoting greater diversity
- Supporting councils to effectively manage their workforce



The WLGA and ADEW are pleased to provide a response to this consultation. The WLGA and local authorities have been proactive and supportive of the Welsh Government's activities and commitment to period dignity. The WLGA has been working with the Welsh Government on this theme for some time now, and local authority leads for Period Dignity (an action from a recent round-table event chaired by the Minister for Social Justice Jane Hutt MS) meet with Welsh Government to discuss issues, share good practice, and provide regular updates and feedback.

Furthermore, regular discussions have taken place between the Welsh Government and the Association of Directors of Education in Wales in a similar vein, pre- and post-Covid, to ensure as funding and resources have become available, that they have been deployed to reach the widest audience so that period poverty is mitigated and period dignity promoted.

Question 1

Do you agree with the vision for period dignity outlined in the plan? What suggestions would you make to improve it?

We agree with, and fully support the vision for period dignity outlined in the plan.

Suggestions to enhance the plan to help it achieve the goals of tackling inequality include:

- increased training and learning opportunities for professionals- teachers, school staff, youth workers, etc, and those that support them, as well as those in roles that support customers, such as housing, leisure, family support etc, and to cover wider sectors such as Health support roles
 - training and learning opportunities for those in the private sector, such as shopkeepers, restaurants etc., – public venues and other public facing roles.
- including a wider communication, information and education programme for all of society as to what counts as 'normal' in terms of menstrual health, as part of the proposed 'communications strategy'. This could potentially reduce late diagnosis of serious conditions such as endometriosis, polycystic ovary syndrome (PCOS), premenstrual dysphoric disorder (PMDD), or gynaecological cancers as well as reducing the anxiety these conditions can incur.

The vision could specifically include for the promotion of information and education in relation to the use of ecofriendly / plastic free products and reference the particular issues surrounding menstruation for disabled people, different faith groups and nationalities, the LGBTQ+ community and those seeking asylum.

Question 2

How achievable is the vision within the next five years? What will prevent achievement of the vision and what may help to realise the vision?

The vision is ambitious but achievable – barriers that are still to overcome though include the competing demands on and pressures in the system, for instance in education, schools will need to focus on this vision whilst also managing the many



other policy initiatives such as a new curriculum, the Additional Learning Needs and Education Tribunal (Wales) Act, the Tertiary Education & Research (Wales) Bill, additional items from the Programme for Government and the Co-operation agreement, plus Covid recovery and addressing learning deficit as a result of Covid impact.

The vision is very broad and covers everyone i.e. “those who have periods have access to good quality and safe products of their choice, when and where necessary, in the most dignified way possible”. However, the actions are more limited, and largely miss some of the most vulnerable groups in society, such as those in and around supported accommodation (action 10 notwithstanding).

During the Covid period, there have been many positive approaches to ensuring the availability of and promotion of period products, whilst schools were closed for regular learning that will provide a legacy for the future. The clear messages around period poverty and period dignity as part of mitigating Covid impact and the way that prioritisation of availability of period products at the beginning of the Covid period has provided many lessons and solutions that will assist future realisation of the vision.

Messaging to young people needs to be carefully tailored to ensure stigma and embarrassment is overcome, and education, (through PSE aimed at both boys and girls, but also to wider society to normalise menstruation) is imperative to promote the normality of periods and period products.

We would request clarity around funding, so that councils can plan to ensure the suitable recruitment, ongoing training and retention of staff. A long-term plan / clear commitment for grant / ongoing funding would assist this, and additional capital and revenue funding is required to support the effective implementation of the action plan within local authorities

The closure of public toilets has been an ongoing concern, where alternative arrangements are made, and incentivised in the private sector, period dignity needs to be foremost in the offer, and a pre-requisite, with grant funding for adaption and promotion of facilities as part of this offer.

Question 3

The Plan is structured by policy theme. Are there themes or specific actions missing from the plan? What are these and whose responsibility are they?

Regarding availability of products in a range of different places, these need to be freely accessible without check or hindrance, and knowledge of locations needs to be readily available. A central or local information site(s) (e.g. website / app / geolocation / mapping) could help with a Wales-wide, universally understood ‘brand / logo’ to indicate presence of free products in the location / building etc. Such a national system of recognition would help promote, be universally visible regardless of literacy / language, and provide dignity and inclusivity.



An awareness raising theme is suggested (which may already be covered in the 'communications' theme, but not yet fully developed), to reference involvement as a young person-led action on how they would like to participate in a two-way conversation with decision makers.

We agree with the broad range of themes within plan. However, as mentioned earlier, there is a need to include a greater focus on informing and educating all of society as to what counts as 'normal' in terms of menstrual health. For example, reducing late diagnosis of serious conditions such as endometriosis, polycystic ovary syndrome (PCOS), premenstrual dysphoric disorder (PMDD), or gynaecological cancers. There needs to be greater consideration of the anxiety these conditions can cause. We would see Welsh Government being responsible for including this in the Strategic Plan, however the actions would need a joined-up approach from all those who work with young people.

Housing and accommodation seems to be a gap. As above the vision is very broad, but actions relating to those in supported accommodation are underdeveloped, it will be difficult to achieve the vision without engaging with these groups.

Although funding is discussed as a theme, more detail on how already embedded programmes within social services (linked to programmes such as Supporting People) would be helpful.

Question 4

Does the Period Dignity Strategic Action plan adequately respond to the intersection between period dignity and period poverty with protected characteristics and the experience of socio-economic disadvantage? If not, how can we improve this?

Yes, we feel that in general, the Action Plan adequately responds to intersectionality. There are a number of technical comments and suggested enhancements that will be evident in individual local authority responses.

The broad range of partners sitting on the roundtable is positive, as is the number of actions and outcomes which explicitly relate to the plan's intended outcomes against protected characteristics.

A focus on the specific experiences of individuals living in rural areas would be beneficial when delivering against action 29. This would support the "access to services" component of the Strategic Equality Duty.

The pre-consultation Integrated Impact Assessment does not explore equalities matters in detail nor does it reference the Socio-economic duty or of the impact of the plan on different protected characteristics. This can be contrasted to the draft LGBTQ+ Action Plan's pre-consultation documents, which included a very robust Equality Impact Assessment. The Integrated Impact Assessment however refers to an 'Equality Impact Assessment' which may cover these matters in detail and it



would therefore be helpful if this assessment was published alongside the integrated assessment. It is important that delivery of the plan is considered through an equality lens and whether any specific and proactive actions are required to engage with specific groups are required.

Many local authorities have moved away from the term 'period poverty' as feedback from young people advice that this has a negative connotation.

There is a good balance between period dignity and period poverty in the strategic action plan. A definition of period dignity/ poverty in a wider context to include 'poverty of understanding', 'poverty of body confidence', 'poverty of language regarding menstruation' and 'poverty of access' is helpful.

Question 5

What more should the Welsh Government do in relation to broader health-based issues such as perimenopause, the menopause, endometriosis, polycystic ovary syndrome (PCOS), premenstrual dysphoric disorder (PMDD) and gynaecological cancers. Do you believe these actions should be included in the Period Dignity Strategic Action Plan or in other policy work?

Yes, we feel these broader health issues should be included in the Period Dignity Strategic Action Plan in addition to these issues being included in other education and public health strategies.

Education and awareness raising about all these broader health conditions should form actions within this plan. These issues are not covered in the RSE draft guidance for schools and should be incorporated into the final RSE guidance (2022). This would increase the likelihood of the conditions being addressed in the new Curriculum for Wales by schools and educating young people about them.

Support should be given to extend this educational work to beyond school-age population for older people who have already missed out on this information.

Question 6

We would like to know your views on the effects that the Period Dignity Strategic Action Plan would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Councils and practitioners report that very few suppliers are able to provide user information in Welsh. Further work with suppliers to create a bank of bilingual information, materials, signage etc., would assist.



It is important that Welsh speaking people can access products and information in Welsh.

Question 7

Please also explain how you believe the Period Dignity Strategic Action Plan could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Again, consideration of bilingual product branding, and availability of bilingual user information is suggested.

Question 8

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

There is further opportunity for the Welsh Government to work with the local authority leads for period dignity, now these have been identified and collated, and we are happy to continue facilitating these discussions to share best practice, create consistency where it is possible and assist in spreading the wider message to all.

Whilst bilingual materials have been discussed, there is a need also for information and promotion in other languages to ensure everyone in our society can access.

Schools and local authorities, and their partner organisations in the third sector have found that having to spend the grant on stock predominately has caused issues with storage etc – we welcome the changes that have been made to make the grant more flexible, but would request further flexibility around adaption of toilet facilities, product dispensers, educational resources, training etc, and allow professional judgement on individual cases to ensure no-one is at detriment because of menstruation.

Whilst the idea of ‘coproduction’ is there in spirit throughout the strategy, it would be good to see this referenced explicitly, particularly in the development of the communications strategy, educational resources etc.

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