

Funding safer futures

A government pathway for the quantity and quality of funding required to help women and children experiencing domestic abuse

Women's Aid

May 2024

Executive summary and recommendations

Local specialist women's domestic abuse support services have saved countless lives and have changed the lives of many more. The value and expertise of these services is well-evidenced, but over the last decade they have been systematically underfunded due to funding and commissioning issues. This is especially the case for services run 'by and for' Black, minoritised and other marginalised groups of women.

There is a lack of transparency relating to public sector investment in domestic abuse support, particularly for funding delivered via local commissioners. Our analysis finds that the government spent an estimated £195 million on local domestic abuse support services in England in 2023-24, although we recognise that there are a number of limitations to this estimate resulting from the level of data publicly available. We also find that the government are investing vital resource into approaches, such as the 'Reducing Parental Conflict' programme, despite evidenced concerns about their safety and effectiveness.

We estimate that current government investment falls £232 million short of the £427 million needed to properly fund local specialist women's domestic abuse services and the separate, ring-fenced funding needed to ensure the sustainability of vital 'by and for' organisations. This figure, based on Women's Aid research, comprises £189 million required for refuges and £238 million for community-based services in England.

We recommend that the next government deliver the minimum investment of £427 million per year by: continuing to deliver the approximately £195 million currently being spent within Department for Levelling Up, Housing and Communities (DLUHC), the Ministry of Justice and the Home Office; securing new investment from further government departments; and generating savings from ending current programmes which are not providing good value for money and crucially are not supporting key outcomes of safety and recovery for survivors. Delivering the £427 million a year would save the Exchequer at least £9 for every £1 spent, due to the costs to public services which would be avoided through local services effectively meeting women's needs.

There are existing legal duties on local authorities to fund accommodation-based domestic abuse support, set out in Part 4 of the Domestic Abuse Act 2021, and forthcoming duties on local partners to collaborate when commissioning community-based services in the Victims and Prisoners Bill, which is currently finalising legislative scrutiny. Yet these lack robust accountability and, in the case of the latter, dedicated funding. Concerning funding and commissioning trends towards gender neutral services, competitive tendering, short-term contracts and a risk-based approach continue unchallenged. Reforms are needed at both national and local level to deliver a

clear, coherent funding approach which provides the right quantity of funding to quality service provision. Our recommendations include the following:

Nationally

- A minimum investment of £427 million per year for local specialist women's domestic abuse services in England, delivered through:
 - DLUHC committing to £189 million per year for funding refuge services, delivered by restricting the £125 million for the Part 4 statutory duty currently spent to specialist women's refuges and 'by and for' services and delivering an additional £64 million to make up the shortfall.
 - The Home Office, Ministry of Justice, Department of Health and Social Care (DHSC) and Department for Education (DfE) delivering the £238 million required for community-based services. We suggest this is delivered by restricting the current £67.8 million spent by the Home Office and Ministry of Justice to funding community-based support services run by specialist women's domestic abuse services and 'by and for' services, and delivering an additional £170 million to make up the shortfall. Funding could be sourced from DHSC and DfE who currently do not provide any dedicated funding for local domestic abuse services and from generating savings from programmes which are not providing good value for money and delivering good outcomes for survivors – for example, £11 million alone could be generated by ending the 'Reducing Parental Conflict' programme.
- Additional ring-fenced funding is required for services led 'by and for' Black and minoritised women, Deaf and disabled survivors and LGBT+ survivors to resource the higher costs of delivering these services and to improve the provision and geographical spread of by and for services across England.
- Cross-government definitions of specialist VAWG services and 'by and for' VAWG services, developed in conjunction with the VAWG sector and adhered to by all government departments.
- Robust statutory guidance for commissioners of specialist domestic abuse services, including the types of provision to be commissioned and the mechanisms for doing so.
- A national oversight mechanism to provide robust accountability for the provision of support to survivors and their children, including strengthened data and reporting and intervention where local commissioners are not complying with legal duties.

Locally

- Comprehensive needs assessments must always be developed in consultation with both commissioned and non-commissioned providers – including ‘by and for’ specialist services.
- The local strategies required under Part 4 of the Domestic Abuse Act 2021 and Part 12 of the Victims and Prisoners Bill must set out clearly how the different elements of service provision will be funded by respective local commissioners.
- Commissioning to give effect to the strategies must follow the requirements of revised national statutory guidance - including the use of established quality standards, flexible commissioning approaches and alternatives to procurement, longer term contracts with in-built inflationary increases, and effective data collection and monitoring.
- Partnership board meetings should always include representatives of specialist domestic abuse services, ‘by and for’ services and survivors, and follow transparent decision-making processes.
- There should be a clear process for any local partner to raise concerns about the effectiveness of local needs assessments, strategies, partnership boards or commissioning approaches with the national oversight mechanism.

Finally, we recommend that the next government undertake an immediate review of funding for local and national domestic abuse, and other forms of VAWG, support services. This is essential to ensure there is an accurate and robust understanding of who is funding what, to determine need and resources in the long term. We recommend that such a review could be undertaken by the National Audit Office or the Public Accounts Committee.

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1. The need for change

Domestic abuse, whilst largely a hidden crime, remains very common; in the year ending December 2023, the police recorded a domestic abuse offence every 40 seconds.¹ A safe and sustainable national network of local specialist women's domestic abuse support services, that meets the needs of women and child survivors, is essential to tackle this and to achieving cross-government commitment to 'decrease the numbers turned away' from support.² Central to this is the delivery of specialist service provision that meets quality standards and upholds duties to eliminate discrimination, and ensure equality, for survivors on the basis of protected characteristics including sex, race, sexual orientation, age and disability.³

The specialist women's domestic abuse sector has developed, expanded and innovated to meet these needs over the past 50 years. These independent, women-led services are experts in meeting the needs of women and children escaping from perpetrators of domestic abuse and supporting them on the road to recovery and freedom. They are continually improving the overall response to domestic abuse in a way that empowers survivors to lead meaningful lives. The work they undertake touches all parts of their local community, from educating children and young people about healthy relationships to improving the criminal justice response to domestic abuse. For example, we know that specialist advocacy for survivors has been found to increase the charge and conviction rate for domestic abuse and reduce attrition.⁴

Put simply, they have saved countless lives and changed the lives of many more.

The value that specialist services deliver is therefore clear and well evidenced, yet for over a decade these services – particularly those services run 'by and for' Black and minoritised women – have faced systemic issues with funding, procurement and commissioning. This remains the most pressing issue facing the domestic abuse sector. Since 2014 Women's Aid's research has evidenced these issues, for example:

- The funding and commissioning landscape for specialist services has resulted in the loss of specialist providers and a move towards smaller number of large organisations, that are not always from the local area or have local expertise.⁵

¹ Office for National Statistics, 'Crime in England and Wales: year ending December 2023', 25 April 2024. Available online: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingdecember2023#domestic-abuse-and-sexual-offences>, accessed 20th May 2024.

² Home Office, Tackling Domestic Abuse Plan - Command paper 639, 1 September 2022. Available online: <https://www.gov.uk/government/publications/tackling-domestic-abuse-plan/tackling-domestic-abuse-plan-command-paper-639-accessible-version#supporting-victims-1>.

³ Equality Act 2010, s.149. Available online: <https://www.legislation.gov.uk/ukpga/2010/15/contents>, accessed 20 May 2024.

⁴ Bates, L., Lilley, S-J., Hester, M. and Justice Project Team, Policy Evidence Summary 3: Specialist advocacy for domestic and sexual violence, University of Bristol, 2018. Available online: https://research-information.bris.ac.uk/ws/portalfiles/portal/188884554/Policy_evidence_summary_3_Specialist_advocacy_for_domestic_and_sexual_violence.pdf, accessed 20 May 2024.

⁵ Women's Aid, 'SOS: Save Refugees, Save Lives', 2014. Available online: https://www.womensaid.org.uk/wp-content/uploads/2015/11/SOS_Data_Report.pdf, accessed 20 May 2024.

- Services responding to Women’s Aid’s Annual Survey have repeatedly highlighted ongoing challenges with poor commissioning and procurement practices, such as the disadvantage which smaller organisations are at within local authority tendering process, especially when competing against larger organisations. For example, in 2019 one service told us their local authority had put out a refuge tender as one lot, and the size of the lot had meant that: “...we were unable to bid for the refuge we have run for over 30 years.”
- Services responding to our most recent Annual Survey remain highly concerned about commissioners’ tendering decisions whose priorities do not align with services’ on-the-ground experience, and that only “crumbs of funding” were left for smaller, specialist services, whilst generic services – which aren’t delivered by domestic abuse specialists - were taking the majority of contracts.⁶
- Funding does not enable services to meet demand; 61% of referrals to refuge services in England were declined and 50.7% of referrals into community-based support services were rejected.⁷

The challenges with the current procurement and commissioning model means that specialist domestic abuse support services in England continue to be underfunded and unable to meet demand from survivors. The inability to effectively help survivors at the first presentation of need can escalate the harm and impact women and children face from domestic abuse and lead to repeated and additional interventions from healthcare, police services, and the wider criminal justice system. This is more expensive, more resource intensive and more wasteful. Ultimately the human and emotional cost of not investing in domestic abuse can be fatal for victims and devastating for their families.

Sustainable investment in specialist support services for survivors will save the taxpayer money. In 2022, the economic and social costs of domestic abuse in England were estimated to be just under £78 billion. With the adequate provision of specialist support services, at the cost of £427 million, the domestic abuse sector could save the public purse as much as £23 billion a year. Every pound invested in domestic abuse support services will see a saving to the Exchequer of at least £9. An investment in specialist services can not only help to save money across wider public services, but it can also help to save lives.⁸

⁶ Women’s Aid, The Domestic Abuse Report 2024: The Annual Audit’, 2024. Available online: <https://www.womensaid.org.uk/annual-audit-2024/>, accessed 20th May 2024.

⁷ Women’s Aid, The Domestic Abuse Report 2024: The Annual Audit’, 2024. Available online: <https://www.womensaid.org.uk/annual-audit-2024/>, accessed 20th May 2024.

⁸ Women’s Aid, Investing to save: the economic case for funding specialist domestic abuse support, February 2023. Available online: https://www.womensaid.org.uk/wp-content/uploads/2023/02/Respublica_web.pdf, accessed 20 May 2024.

2. Current government spending on local domestic abuse services and wider spending on domestic abuse and VAWG

The challenge

There is a lack of transparency in the level of public sector investment in domestic abuse support. Funding for domestic abuse support services is currently delivered in a range of ways:

- Central government funding pots for domestic abuse and VAWG which are distributed by local authorities and Police and Crime Commissioners (PCCs);
- Wider central government funding to public services, such as the local government revenue support grant, core funding for PCCs, and health funding, from which it is not clear how much is spent on domestic abuse and/or VAWG services;
- Central government funding directly awarded to national VAWG organisations;
- One off national funding pots which are open to both local and national organisations to bid for, such as those launched by the Home Office.

In particular, funding that is devolved to local commissioners is not accompanied with robust reporting or monitoring requirements, and it is therefore not possible to monitor or assess local spending with any satisfying level of accuracy. Specifically, there is very limited public information available on how much is spent by local commissioners, and the organisations that they fund. From currently published and accessible information, it is therefore impossible to precisely categorise whether funding is being awarded to:

- Specialist women's domestic abuse services;
- Specialist 'by and for' domestic abuse and VAWG services;
- Generic organisations who provide domestic abuse services;
- Statutory agencies, such as local authorities.

Understanding this is critical.

Survivors continue to report poor responses from public services, and specialist women's domestic abuse services and 'by and for' services have unique expertise, knowledge and a proven track record in supporting women and children experiencing domestic abuse. The distinction between specialist and generic services for women experiencing domestic abuse is recognised in international law, with the Istanbul Convention requires government to provide or arrange for specialist women's support services to all women victims of violence and their children.⁹ In addition, government guidance makes clear that local areas should have sufficient local specialist VAWG

⁹ Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence (Istanbul Convention), Articles 20 and 22. Available online: <https://rm.coe.int/168008482e>, accessed 20 May 2024.

service provision, including specialist 'by and for' services, which are uniquely placed to respond to the specific needs and experiences of the communities they support.¹⁰

The Domestic Abuse Commissioner's (DAC's) mapping research found that over half of domestic abuse services in England and Wales in the financial year ending March 2021 were provided by domestic abuse and VAWG organisations (51% of community-based support services and 64% of accommodation based services); 'by and for' specialist services deliver 12% of community based services and 13% of accommodation based services; and the remaining 36% of community based services and 24% of accommodation based services are delivered by generic organisations or public services.¹¹ This mapping research found that spending on domestic abuse support by commissioners (PCCs, local authorities and health bodies) within PCC areas totalled an average of £3.2 million in the year ending March 2021, amounting to £128 million in England.¹² From the data collected it is not possible to determine how much local commissioners spent on specialist, 'by & for' and generic organisations respectively.

Whilst a fuller picture of local spending on domestic abuse support services could be developed using responses to Freedom of Information (FOI) requests and the financial accounts of relevant commissioners and service providers, this would take significant resource and would still likely be an incomplete analysis. For example, Women's Aid currently issues FOI requests to all local authorities in England to provide a comprehensive picture of refuge commissioning – however the FOI returns show there is variation in how local authorities define different services types, and the complex nature of funding for domestic abuse services (e.g. contracts for different types of support and different contract lengths) mean that data is not always comparable.

Funding for domestic abuse support services

Whilst these challenges mean that it is not currently possible to provide a complete picture of funding for local domestic abuse services, Women's Aid has conducted an analysis of national government spending on local domestic abuse support services for the financial year 2023-24.

Our analysis shows that published government spending on local domestic abuse support services in England totalled an estimated £195 million in 23-24, delivered by funding from the Department for Levelling Up, Housing and Communities (DLUHC), Ministry of Justice and the Home Office. This compares with an estimated £128 million for England in the DAC's research in 2020-21. These estimates have been developed from 'opposite ends' - Women's Aid's estimate is based on nationally reported funding

¹⁰ Home Office, 'Violence Against Women and Girls - National Statement of Expectations', 2022. Available online: https://assets.publishing.service.gov.uk/media/6244459dd3bf7f32a93d3b76/National_Statement_of_Expectations_2022_Final.pdf

¹¹ Domestic Abuse Commissioner, 'A Patchwork of Provision: How to meet the needs of victims and survivors across England and Wales', 2022. Available online: <https://domesticabusecommissioner.uk/wp-content/uploads/2022/11/A-Patchwork-of-Provision-Technical-Report-Nov-2022-Final.pdf>

¹² These figures exclude the outlier figures for London (City of London Police Authority Board, and MOPAC London PCC areas) and tier two local authorities, which limited how much money appeared to be spent.

for local services, whereas the Domestic Abuse Commissioner’s estimate is based on reported funding by local commissioners.

Women’s Aid’s estimate is likely higher as there have been additional government funding streams for local support services launched since the DAC’s mapping report in 2021 and in some cases we have not been able to accurately disaggregate funding for Wales, or for sexual violence, so these are included in the total. However, we may have also underestimated general local authority, PCC and ICB and Hospital Trust spending on local domestic abuse support services as this is not publicly available information. Where funding announcements have been multi-year, we have estimated annual spend and we recognise that this is limitation with the estimate, as in reality there will have not been an even annual split across multi-year funding streams.

In addition, published government spending on national domestic abuse support services in England totalled £12.4 million in 2023-24, delivered largely by the Home Office.

No public information is available on funding from the Department of Health and Social Care or Department for Education¹³ to domestic abuse support services, at either local or national level.

Department	Spending on local domestic abuse support services in England in 23/24 ¹⁴	
Department for Levelling Up, Housing and Communities	127.3 million	Delivery of statutory duty on domestic abuse safe accommodation, for which local authorities received £127.3 million in 2023-2024 and £129.7 million in 2024-2025. ¹⁵ Allocations of this funding are made locally, and it is not only funding specialist women’s domestic abuse support services but is also used to fund support within safe accommodation for victims with relevant protected characteristics, such as LGBTQ+ victims, male victims, as well as the support needs of children.
	Unknown	Local government revenue support grant – we know that local authorities use their general

¹³ Local authorities deliver children’s social care services, with funding to support this coming from across Government, including local government funding as well as money that is allocated directly to the Department for Education. The Department for Education state that in this Spending Review period a total of £5 billion of ringfenced funding for adult and children’s social care will have been distributed to local authorities through the Social Care Grant.

¹⁴ Some funding streams are multi-year, where this is the case we have divided assuming an even annual split. We have excluded any funding for Wales within these totals where possible.

¹⁵ Department for Levelling Up, Housing and Communities, ‘Local Authority Domestic Abuse Duty: 2023 to 2024 and 2024 to 2025 funding allocations’, 12 December 2022. Available online: <https://www.gov.uk/government/publications/local-authority-domestic-abuse-duty-2023-to-2024-and-2024-to-2025-funding-allocations>, accessed 20 May 2024.

		funding to support domestic abuse services but there is no publicly available information on this.
Department for Health and Social Care	Unknown	Although NHS England has recently undertaken mapping of spending by health bodies on domestic abuse and sexual violence, this information is not publicly available.
Home Office	£3,674,484	VAWG Support and Specialist Services (VSSS) fund - totalled £8,271,529 for 23-25, £7,348,968 of which was for funding 'specialist VAWG' and 'by and for' services. This included funding to public services, some national organisations and non-specialist organisations, and wasn't solely awarded to domestic abuse services. ¹⁶
	£3,906,751	Children affected by domestic abuse (CADA) fund - totalled £10,378,202 for 22-25, £7,813,502 of which was to organisations in England. This included funding for public services. ¹⁷
Ministry of Justice	£60,065,728.59	Ring-fenced for community- based services for domestic abuse and sexual violence from the MOJ to PCCs (including ISVAs and IDVAs) in 2023-24. This information was provided by the MOJ in response to an FOI from Women's Aid and correct as of September 2023. ¹⁸
Funding totals	£194,946,963	

¹⁶ Home Office and Ministry of Justice, 'Funding boost for specialist victim support services', 25 July 2023. Available online: <https://www.gov.uk/government/news/funding-boost-for-specialist-victim-support-services>, accessed 20 May 2024.

¹⁷ Home Office, 'New funding to support child victims of abuse', 4 January 2023. Available online: <https://www.gov.uk/government/news/new-funding-to-support-child-victims-of-abuse>, accessed 20 May 2024.

¹⁸ The results of the FOI request from Women's Aid and MoJ are available on request. This total does not include any core funding which PCCs use to fund DA/SV services, which they allocate based on their assessment of local need.

Department	Spending on national domestic abuse support services in 23/24	
Home Office ¹⁹	£3,727,702	What works to prevent VAWG fund, totalled £7,455,404 from 22-25.
	£2,025,430	Tackling DA Plan states that Home Office will “double funding for National Domestic Abuse Helpline, and further increase funding for all the national helplines.”
	£2,500,000	Interventions within healthcare settings, including to upskill healthcare professionals. A total of 7.5 million announced in the Tackling DA Plan.
	£200,000	Awarded for improving responses to economic abuse in Tackling Domestic Abuse Plan.
	£1,350,500	Emergency fund for survivors of domestic abuse - awarded to Women’s Aid to disperse to survivors in 2023.
	£1,400,000	Supporting migrant victims pilot.
Ministry of Justice	£1,200,000	Nationally distributed IDVA/ISVA training fund. ²⁰
Totals	£12,403,632	

We also note that government departments award individual grants to national domestic abuse organisations for a range of reasons, including for infrastructure support, the details of which are not public.

The above does not cover the entirety of funding for specialist domestic abuse services – as the uncertainty and scarcity of statutory funding requires that they secure wider funding from charitable donations, trusts, foundations and other sources. In particular, the Domestic Abuse Commissioner’s mapping research has found that over a fifth (23%)

¹⁹ Home Office, Tackling Domestic Abuse Plan - Command paper 639, 1 September 2022. Available online: <https://www.gov.uk/government/publications/tackling-domestic-abuse-plan/tackling-domestic-abuse-plan-command-paper-639-accessible-version#supporting-victims-1>.

²⁰ Home Office and Ministry of Justice, ‘Funding boost for specialist victim support services’, 25 July 2023. Available online: <https://www.gov.uk/government/news/funding-boost-for-specialist-victim-support-services>, accessed 20 May 2024.

of specialist by and for domestic abuse services receive no statutory funding at all.²¹ Quantifying support provided by these sources of income such as charitable grants is also challenging. A report commissioned by the National Lottery Community Fund, Esmeé Fairbairn Foundation, and Rosa and published in April 2023 found that income data for women and girls' charities across the UK indicated £1.3 billion of income from charitable grants for the sector in the financial year ending 2021, however this is wider than the VAWG sector alone.²²

Wider government spending on domestic abuse and VAWG

It is important to note that this does not cover the entirety of government spending on domestic abuse and VAWG – for example we know that the Home Office spent £18million on perpetrator interventions in 23-24.²³ We have limited our analysis to domestic abuse and have not analysed wider spending on VAWG – including specific spending on sexual violence, FGM and online and image-based abuse. We have also not included wider elements such as: prevention and awareness raising campaigns; policing, criminal justice and the courts; housing; benefits; schools and education; improved training for professionals and other public service responses, which are all critical for the broader response to domestic abuse and VAWG.

In addition, the government currently funds a number of wider programmes and interventions which impact on survivors of domestic abuse – ranging from early intervention and family help schemes, homelessness and housing projects, health interventions and many more. Whilst such broader interventions are critical for the domestic abuse response, we have significant concerns about the safety and effectiveness of certain schemes for survivors, which are detailed below.

Reducing Parental Conflict programme

The Department for Work and Pensions (DWP) has funded the Reducing Parental Conflict (RPC) programme to “address parental conflict.” From 2018 – 2021 DWP provided £39 million for the programme,²⁴ and have committed £33 million between 2022-25.²⁵ Women's Aid, alongside other domestic abuse organisations, have raised serious concerns about the fact professionals referring parents to this programme currently do not have the expertise to distinguish parental conflict from coercive control

²¹ Domestic Abuse Commissioner, 'A Patchwork of Provision: How to meet the needs of victims and survivors across England and Wales', 2022. Available online: https://domesticabusecommissioner.uk/wp-content/uploads/2022/11/DAC_Mapping-Abuse-Survivors_Long-PolicyReport_Nov2022_FA.pdf

²² Rosa, 'Mapping the UK Women and Girls Sector and its Funding: Where Does the Money Go?', 2023. Available online: <https://rosauk.org/wpcontent/uploads/2023/04/Women-and-Girls-Sector-Research-Mapping-Report-Amended.pdf>

²³ Home Office, 'Fund launched to protect domestic abuse victims through prevention', 9 January 2023. Available online: <https://www.gov.uk/government/news/fund-launched-to-protect-domestic-abuse-victims-through-prevention>, accessed 20 May 2024.

²⁴ Department for Work and Pensions and Government Social Research, Reducing Parental Conflict Programme 2018–2022: Final Evaluation Report, August 2023.

²⁵ Department for Work and Pensions, 'New projects launched to reduce parental conflict and help families thrive' 8 June 2023. Available online: <https://www.gov.uk/government/news/new-projects-launched-to-reduce-parental-conflict-and-help-families-thrive#:~:text=The%20Government%20has%20committed%20up,Family%20Hubs%20and%20Supporting%20Families,> accessed 20 May 2024.

and domestic abuse. Serious case reviews and domestic homicide reviews consistently find that inadequate understanding and identification of domestic abuse is a common theme, particularly in relation to coercive control. We have raised repeated concerns about the lack of specialist training, understanding and safe assessment processes within this programme but our concerns have not been resolved. The government's own evaluation, which did not include input from specialist domestic abuse organisations, has found that:

- Less than half (49%) of parents who engaged with parental conflict support found sessions helped to improve their relationship.
- At least 2 in 10 participants who had completed the RPC programme within 12 months and then accessed further relationship support went onto access domestic abuse support.
- "A key early challenge local authorities reported was working out at what point conflict in a relationship becomes abusive. They appreciated that conflict in relationships was very common and were struggling to find mechanisms to help distinguish between acceptable and unacceptable conflict. Knowledge and understanding of the three key elements of domestic abuse (power imbalance, fear and control) was not widespread."²⁶

We remain highly concerned about the safety and effectiveness of this programme, and its definitions and interpretations of 'acceptable' and 'unacceptable' conflict in relationships. It continues to lack the necessary input from specialist domestic abuse organisations, particularly in terms of identifying, understanding of and training on coercive and controlling behaviour, required to ensure it will not do further harm to women and children experiencing domestic abuse.

We recommend the next government ends this programme, which would generate an estimated saving of £11 million per year.

Families First for Children

The Families First for Children (FFC) pathfinder was announced in February 2023 as part of the government's children's social care implementation strategy, 'Stable homes, built on love'. From July 2023 to March 2025, the programme is investing over £45 million to design and test radical reforms in a number of local areas, across the following policies:

- Family help
- Child protection
- Family network support packages (FNSPs)
- Safeguarding partners

We are concerned that the pathfinder is drawing on evidence and practice from other government programmes, including the reducing parental conflict programme. Our concerns about this are set out above and whilst we are yet to see the evaluation of the

²⁶ Department for Work and Pensions and Government Social Research, Reducing Parental Conflict Programme 2018–2022: Final Evaluation Report, August 2023.

FFC pathfinder, the aims set out an intention to help and intervene with regards to domestic abuse in efforts to protect a vulnerable child. Whilst this intention is welcome, it is clear from communications on this pathfinder have described domestic abuse as a “challenge”, akin to addiction or poor mental health.

This messaging not only highlights a lack of understanding and knowledge of domestic abuse, but also perpetuates victim-blaming and fails to recognise that domestic abuse is a crime perpetrated by abusers, who are solely responsible for their actions which have devastating mental, emotional, physical, social and financial impacts on survivors. We are also concerned that the programme suggests a pro contact approach despite the Ministry of Justice’s Harm Panel report highlighting the harm associated with this, which includes detracting from a child’s welfare and safety.

We recommend that the evaluation of the FFC pathfinder includes an assessment of the percentage of families where domestic abuse is a factor, and for these families to be supported by specialist services and for – at a minimum – a matching percentage of funding to be directed to these services.

Further evaluation

As noted, the government currently funds a number of wider programmes and interventions which impact on survivors of domestic abuse. There are therefore additional programmes, such as the former Troubled Families and now named Supporting Families, which require expert evaluation into their safety and effectiveness - which should be conducted in partnership with domestic abuse experts. The findings of these evaluations have the real potential to lead to further savings for government departments, statutory agencies and the taxpayer.

3. The national funding and delivery required

In 2019, Women's Aid first undertook an assessment of the level of investment needed to effectively resource the specialist domestic abuse sector.²⁷ We updated the estimate in 2022 to account for population increase and inflation. The 2022 figures show that an annual investment of £427million is required to adequately fund women's specialist domestic abuse services in England – comprising of £189 million for refuges and £238 million community-based services²⁸ – to the level required to support women and children who need to access them.²⁹ This funding will need to increase according to population and inflationary increases.

We recommend that the next government deliver the minimum investment of £427 million per year through a combination of: continuing to deliver the approximately £195million currently being spent within DLUHC, the Ministry of Justice and the Home Office, but restricting this funding for specialist women's domestic abuse services and 'by and for' services (further detail on which is outlined in sections 4 and 5); securing new investment from government departments; and generating savings from scrapping programmes which are not supporting safety and recovery for survivors of domestic abuse.

We recommend:

- DLUHC commit to £189 million per year for funding refuge services in England and delivering the Part 4 statutory duty. We suggest this is delivered by restricting the £125 million currently spent to specialist women's refuges and 'by and for' services and delivering an additional £64 million to make up the shortfall. As the current £125 million provided by DLUHC does not only fund refuge services, a further estimate of additional funding required for other forms of safe accommodation – such as Sanctuary Schemes – is also required. Further capital investment is also needed to improve the accessibility of accommodation for all survivors.
- The Home Office, Ministry of Justice, Department of Health and Social Care and Department for Education jointly deliver the £238 million required for community-based services. We suggest this is delivered by restricting the current £67.8 million spent by the Home Office and Ministry of Justice to funding community-based support services run by specialist women's domestic abuse services and 'by and for' services alone and delivering an additional £170 million to make up the shortfall. We suggest that this delivered through funding from

²⁷ Women's Aid, 'Funding Specialist Support for Domestic Abuse Survivors', 2019. Available online: <https://www.womensaid.org.uk/wp-content/uploads/2019/12/Funding-Specialist-Support-Full-Report.pdf>, accessed 20 May 2024.

²⁸ Community based support services as costed in this report include the four following areas of work which are essential to provision: outreach, floating support and advocacy (including IDVA) services; dedicated support for children and young people; therapeutic support, such as formal counselling and support groups; and community outreach support (education and awareness raising work e.g. training professionals or work in local schools).

²⁹ Women's Aid, 'Funding Specialist Support Updated Estimates', December 2022. Available online: <https://www.womensaid.org.uk/wp-content/uploads/2023/01/Funding-Specialist-Support-Updated-estimates-Dec-22.pdf>, accessed 20 May 2024.

DHSC and DfE, who currently do not provide any dedicated funding for local domestic abuse services, and by generating savings by reviewing programmes which are currently not delivering good value for money or delivering key outcomes of safety and recover for survivors – for example, £11 million alone could be found by ending the Reducing Parental Conflict programme.

£427 million is Women’s Aid’s estimate of a minimum level of investment for local specialist domestic abuse services for women and children in England. It does not cover national domestic abuse support provision, or the wider elements of a domestic abuse response – such as prevention, training, awareness raising and perpetrator interventions – covered in section two.

The £427 million must also be accompanied with separate, ring-fenced funding for specialist services led ‘by and for’ Black and minoritised women, d/Deaf and disabled women, and LGBT+ survivors. These groups face discrimination and have a wide range of needs including mental health, physical disability and substance use. As a result, the length and nature of a support journey for different cohorts of women can vary greatly and services supporting marginalised groups specifically will experience this disparity of cost at higher levels.³⁰ The ‘by and for’ sector has also faced significant underfunding, resulting in severe inequalities in provision and access across the country.³¹ A ring-fenced funding model for the ‘by and for’ sector should be developed with the ‘by and for’ sector and cover both the cost disparity faced by this group of services, and resources for capacity building to improve the provision and geographical spread of specialist ‘by and for’ services across England.

We also recognise that further work is required to estimate the level of spending required for services for male victims.

³⁰ Women’s Aid, ‘Funding Specialist Support for Domestic Abuse Survivors’, 2019. Available online: <https://www.womensaid.org.uk/wp-content/uploads/2019/12/Funding-Specialist-Support-Full-Report.pdf>, accessed 20 May 2024.

³¹ Domestic Abuse Commissioner, ‘A Patchwork of Provision: How to meet the needs of victims and survivors across England and Wales’, 2022. Available online: https://domesticabusecommissioner.uk/wp-content/uploads/2022/11/DAC_Mapping-Abuse-Survivors_Long-PolicyReport_Nov2022_FA.pdf

4. Legal duties for domestic abuse funding and commissioning at local level

Domestic Abuse Act 2021

Part 4 of the Domestic Abuse Act 2021, or the Safe Accommodation Duty, places a duty on Tier 1 local authorities in England to provide accommodation-based support to adult and child³² victims of domestic abuse. As part of this duty, local authorities must:

- Conduct a needs assessment;
- Publish a local strategy based on the assessment;
- Set up a local partnership board with representation from different groups to inform commissioning.

There are limitations to what the statutory duty funding can be spent on, which are welcome. For instance, the regulations underpinning the duty explicitly exclude funding of private forms of accommodation such as Bed and Breakfasts. However, despite efforts by Women's Aid and Imkaan to amend the law to require councils to fund specialist and 'by and for' refuge services, the duty does not require local authorities to report on the types of service providers they are funding. There is therefore limited transparency in the allocation of funding for the duty to specialist women's domestic abuse services and 'by and for' organisations. In some cases, we are aware of councils that have spent funding for safe accommodation on services that fall outside the scope of the Act – including, for example, accommodation which is mixed gender and support delivered outside of accommodation.

Furthermore, despite best practice on domestic abuse service commissioning being outlined by the Home Office and within statutory guidance for the Domestic Abuse Act 2021, there is extremely limited accountability when local authorities do not follow this. Linguistic ambiguities between the terms 'should' and 'must' throughout the guidance make it difficult for specialist domestic abuse services to know which decisions can be challenged.

The result is that, in a number of areas, generic housing-focused providers and 'in-house' local authority services have been favoured ahead of specialist women's organisations despite their years of demonstrated expertise in meeting survivors' needs. It is well evidenced that large proportions of the funding are not reaching specialist domestic abuse services and 'by and for' services; only forty percent (42.5%) of domestic abuse organisations responding to our Annual Survey 2023 had noticed that there was

³² *Domestic Abuse Act 2021*, s1. Available online: <https://www.legislation.gov.uk/ukpga/2021/17/contents/enacted>, accessed 20 May 2024. The statutory definition of domestic abuse in section one of the act legally recognises children as victims in their own right for the first time.

more funding available as a result of the statutory duty. A Freedom of Information request submitted to local authorities by Women's Aid found that, in 2022-23, only 40% of 'by and for' Black and minoritised women's refuge services run by members of Imkaan were commissioned by a local authority.³³

Victims and Prisoners Bill

Parts 12 to 14 of the Victim and Prisoners Bill, which is currently finalising legislative scrutiny, places a duty on local authorities, Police and Crime Commissioners and Integrated Care Boards to collaborate when commissioning community-based services for domestic abuse and sexual violence.³⁴ The duties will require those bodies to:

- Prepare and publish a local strategy on commissioning victim support services;
- Ensure the strategy is informed by certain activities, including a strategic assessments of victims' needs and local consultation;
- Review and revise the strategy from time to time.

The government are expecting local areas to publish their first strategy within 12 months of commencement of the legislation.

The Bill does not, however, attach any statutory funding to the duty or to these services. This is a clear concern for a number of reasons set out in this paper. Women's Aid's Annual Survey highlighted that 49% of respondents had been running an area of their domestic abuse service in 22-23 without any dedicated funding and this was especially the case for community-based support services like therapeutic support. Almost a quarter (23.5%) of those who were running a service without dedicated funding were running 'children and young people's domestic abuse services in refuge' and/or 'children and young people's domestic abuse services in the community' (15.7%), showing that significant funding gaps remain for child survivors, despite the changes to define children as victims in their own right in the Domestic Abuse Act 2021.³⁵

Similarly to the Domestic Abuse Act, the duty to collaborate in the Victims and Prisoners Bill also lacks key detail and specificity about the types of services which should be commissioned. Women's Aid, alongside other domestic abuse organisations, have been calling for the duty to collaborate to be amended to specify that "*specialist women's community-based and sexual violence support services*" must be commissioned, with adequate funding to support the delivery of the duty. Women's Aid has also continued to recommend that a national oversight mechanism is established to oversee the implementation of the duty, to avoid the issues with accountability arising from the Domestic Abuse Act 2021. A national oversight mechanism would also play a key role in assessing need for, and monitor the commissioning of, 'by and for' specialist services.

³³ Women's Aid, 'The Domestic Abuse Report 2024: The Annual Audit', 2024. Available online: <https://www.womensaid.org.uk/annual-audit-2024/>, accessed 20th May 2024.

³⁴ Ministry of Justice, 'Victims and Prisoners Bill', Available online: <https://www.gov.uk/government/publications/victims-and-prisoners-bill>, accessed 20 May 2024.

³⁵ Women's Aid, 'The Domestic Abuse Report 2024: The Annual Audit', 2024. Available online: <https://www.womensaid.org.uk/annual-audit-2024/>, accessed 20th May 2024.

5. Key challenges with current funding delivery

We recognise that the estimated £195 million funding from central government for local domestic abuse support services is not insubstantial. However, this investment is not tackling the funding crisis facing specialist women's domestic abuse services and 'by and for' services, due to how the serious problems in *how* funding is delivered. There is currently no clear model through which local specialist domestic abuse services are funded. Rather, there are disparate funding pots which target individual service types – such as refuge and accommodation-based services, advocacy, and services for children. This leads to siloed, fragmented funding that doesn't reflect the interconnected nature of service provision and the importance of sustainable funding for all service types.

The next government will need to both increase funding to a minimum of £427 million, and reform the model of funding delivery, to ensure survivors can access the specialist support services they need.

There are a number of key challenges that need to be tackled within reform of the funding landscape:

Gender neutrality and 'one size fits all'

There continues to be a concerning push towards gender neutrality within the funding and commissioning landscape for support services, which has severe implications for specialist women's services and those led 'by and for' minoritised groups.

All survivors, including male survivors, need to access the right support. However, treating survivors equally does not mean treating them the same. It is well evidenced that women-only services are not only essential for physical and emotional safety, but deliver a unique range of benefits - including empowering women, enabling them to develop confidence, building independence and higher self-esteem, and supporting recovery from domestic and sexual violence.³⁶ Women-only services which are designed to respond to women's specific experiences and needs are most effective at helping them to engage and recover.³⁷

Despite this, funding and commissioning increasingly favours a gender-neutral approach, with one provider for all victims. The Domestic Abuse Commissioner's mapping research found that the vast majority (70%) of domestic abuse services commissioned by local authorities and Police and Crime Commissioners are currently not sex or gender specific.³⁸ The UN Special Rapporteur on Violence Against Women has

³⁶ Women's Resource Centre, 'Why Women Only: the value and benefit of by women and for women services', 2006. Available online: <https://www.wrc.org.uk/Handlers/Download.ashx?IDMF=dffb1f5e-aa65-4f01-8f03-ca5d4bd30170>, accessed 20 May 2024.

³⁷ Agenda, AVA and Barrow Cadbury Trust, 'Mapping the Maze: Services for Women Experiencing Multiple Disadvantage in England and Wales', 2016. Available online: <https://www.agendaalliance.org/documents/119/Mapping-the-Maze-final-report.pdf>, accessed 20 May 2024.

³⁸ Domestic Abuse Commissioner, 'A Patchwork of Provision: How to meet the needs of victims and survivors across England and Wales', 2022. Available online: <https://domesticabusecommissioner.uk/wp-content/uploads/2022/11/A-Patchwork-of-Provision-Technical-Report-Nov-2022-Final.pdf>

stated that commissioners and funders in the UK are “preferring large generic service providers in order to cut costs, thereby disrupting life-saving services and losing the vital expertise and experience of specialist services in supporting survivors”.³⁹

This approach not only fails to meet women’s needs, but inherently disadvantages women-only services and those led ‘by & for’ Black and minoritised women’s services. The push for ‘universal’ or ‘one size fits all’ services disadvantages and devalues the expertise of specialist women’s services, which are delivered by staff with in-depth knowledge of VAWG and within organisations with decades of experience in meeting women’s needs.

Procurement

At local level domestic abuse services are typically commissioned through procurement processes. The challenges facing charities in competing fairly within procurement processes are well documented. Research by Lloyds Bank Foundation has concluded that these challenges centre on three key issues: lack of knowledge by commissioners about the service they are commissioning and the needs of individuals; aspects of contracts and tender specifications can automatically exclude smaller charities; the processes commissioners follow can inadvertently impede on providers’ ability to bid effectively and successfully.⁴⁰

These challenges are repeatedly raised as key concerns by specialist women’s domestic abuse services and ‘by and for’ services who are forced to compete against large, generic organisations, with marketing and bid writing teams, who can deliver large contracts and economies of scale. Too often, procurement processes are not designed to deliver the specific support different groups of women need, or to value the knowledge, expertise and track record that specialist women’s and ‘by and for’ organisations hold in meeting these needs.

Despite the fact that government guidance¹⁰ makes clear that grant funding and partnership approaches are best practice when funding VAWG services, at local level procurement continues to be the primary method of commissioning. Without urgent action to reform the use of procurement and competitive tendering for specialist women’s domestic abuse services and ‘by and for’ services, the sector will continue to be at severe risk.

³⁹ United Nations Special Rapporteur on Violence against women and girls, its causes and consequences, Reem Alsalem, ‘Official visit to the United Kingdom of Great Britain and Northern Ireland: Summary of Preliminary Findings and Recommendations’, 21 February 2024. Available online: <https://www.ohchr.org/sites/default/files/documents/issues/women/sr/statements/20240221-eom-statement-uk-sr-vawg.pdf>, accessed 20 May 2024.

⁴⁰ Lloyds Bank Foundation, ‘Commissioning in Crisis: How Current Contracting and Procurement Processes Threaten the Survival of Small Charities’, 2016. Available online: <https://www.lloydsbankfoundation.org.uk/media/ulrkb1f/commissioning-in-crisis-full-report.pdf>, accessed 20 May 2024.

Short termism, inefficiency and unsustainability

Funding is often allocated for one to two year periods, which severely limits the sector's ability to recruit and retain staff or plan ahead. The most common challenge faced by domestic abuse services surveyed by Women's Aid in 2022 was funding, where short term contracts left organisations often unable to plan for the future.⁴¹ Short term contracts require organisations to recruit, induct and train staff to deliver support services, only to potentially close the service a year later and make staff redundant. This short termism is inefficient, keeps services in a constant state of turmoil, prevents service sustainability, development and improvement, and lets survivors who rely on services down.

Services have continued to raise urgent concerns that despite increasing caseloads and complexity of need, which were exacerbated by the COVID 19 pandemic, funding and contract levels have remained the same. These long-term trends have been compounded by rapid inflation and increases to the cost of living, which means salaries within the specialist domestic abuse sector do not reflect the expertise required to undertake this complex, challenging work. This is leading a recruitment and retention crisis in the domestic abuse and wider VAWG sector. A survey of Women's Aid members found that 78% of responding organisations were struggling to recruit for vacant roles at the salaries they can pay – and this reached 92% of 'by and for' Black and minoritised women's services. 67% of organisations reported they have lost staff who have left either to work in a higher paid role elsewhere or because they can no longer afford to keep working. Over half had lost staff to a local authority – reflecting the concerning rise of 'in-house' domestic abuse support roles within local authorities, which do not deliver the independent, women-led support which is at the heart of specialist domestic abuse provision.⁴²

Staff who remain are having to support more women experiencing violence and abuse, with less resource, which is leading to vicarious trauma and burnout. This is unsustainable and is having a direct impact on the support that women and children experiencing domestic abuse need.

The risk-based approach

It is critical that a woman gets the right response, the first time she reaches out for help, as often she will have been experiencing abuse for a protracted period of time. From a sample of over 38,000 women using domestic abuse support services in 2021-22, the average length of abuse before accessing support was six years.

However, due to the dominance of the current risk-based approach, the high volume of domestic abuse cases and restricted budgets, a high-risk parameter is often used to

⁴¹ Women's Aid, 'The Domestic Abuse Report 2023: The Annual Audit', 2023. Available online: <https://www.womensaid.org.uk/wp-content/uploads/2023/01/The-Domestic-Abuse-Report-2023-The-Annual-Audit-FINAL.pdf> accessed 20 May 2024

⁴² Women's Aid, 'Women's Aid members' experiences of the cost of living crisis – November 2022 survey findings', 2023. Available online: <https://www.womensaid.org.uk/wp-content/uploads/2023/01/For-WAFE-publication-members-experiences-of-the-cost-of-living-crisis.pdf> accessed 20 May 2024.

determine what support a woman can access. The Domestic Abuse, Stalking and Honour Based Violence (DASH 2009) is the most common tool used to identify a woman's risk level. Those assessed at 'high risk' will typically be referred to a Multi-Agency Risk Assessment Conference (MARAC) and can access support from an Independent Domestic Abuse Advocate (IDVA). The DASH was intended as an information gathering tool to be used by experienced advocates to identify and manage immediate and future harm, rather than as a gateway to services.⁴³

There remain serious concerns with the adequacy of risk assessments and such tools to determine what support and intervention is provided. Analysis of Domestic Homicide Reviews (DHRs) continues to find significant concerns with risk assessment in cases of domestic abuse. In a study of 46 DHRs published between 2017-2019, 66% of victims were not assessed as at high risk and only 22% of cases were reported as having been referred to a Multi-Agency Risk Assessment Conference (MARAC) prior to the homicide.⁴⁴

Domestic abuse services continue to state that there is very limited funding for support in the community where women are not assessed at 'high risk'. In particular, our members report that PCC funding is often restricted for IDVAs, supporting those at high risk alone for a time-limited period.⁴⁵ This negatively impacts specialist domestic abuse services and the expertise that they have developed over the past five decades. It results in major gaps in for those assessed at "medium and low risk" and restricts funding for women's community-based services that deliver early intervention and long-term support. This is critical for responding to the wide-ranging impacts of coercive control on women's lives, their support needs, and the complex process of recovery.

An evaluation of two approaches to developing domestic abuse interventions in England found that the current risk-based service criteria is a barrier to accessing domestic abuse support and concluded that reforming this would increase consistency of support for survivors and their families. It recommended that commissioners should look at reforming these criteria to reflect survivors' lived experiences.

⁴³ Andy Myhill and Katrin Hohl, *The Golden Tread: coercive control and risk assessment for domestic violence*, 2016; Amanda Robinson, *Risk assessment and the Importance of Victim Intuition. Safe: the domestic abuse quarterly, a national journal for practitioners*. 21, 18 – 21, 2007.

⁴⁴ Khatidja Chantler, 'Domestic Homicide Oversight Mechanism for the Criminal Justice System Summary of Findings, Domestic Abuse Commissioner', 2023. Available online: <https://domesticabusecommissioner.uk/wp-content/uploads/2023/12/Summary-of-Findings-Criminal-Justice-Domestic-Homicide-Oversight-Mechanism.pdf>, accessed 20 May 2024.

⁴⁵ Women's Aid, 'The Domestic Abuse Report 2023: The Annual Audit', 2023. Available online: <https://www.womensaid.org.uk/wp-content/uploads/2023/01/The-Domestic-Abuse-Report-2023-The-Annual-Audit-FINAL.pdf>, accessed 20 May 2024.

6. Recommendations for a new model of funding

We recommend the following reforms to tackle these challenges and ensure that funding reaches the services that women and children experiencing domestic abuse need. Reforms are needed at both national and level to deliver a clear, coherent funding approach which provides the right quantity of funding to quality service provision.

A. Nationally

Funding package

As outlined in section three, we recommend that the next government deliver the minimum investment of £427 million per year for specialist women's domestic abuse services, increasing this figure according to population and inflationary increases. Given the perilous local authority financial context, and as most national domestic abuse and VAWG budgets are due to end in 2025 due to the current Spending Review period, there is an urgent need for this budget to be guaranteed.

Separate funding will be required for national domestic abuse support provision and the wider elements of a domestic abuse response – such as prevention, training, awareness raising and perpetrator interventions.

If this funding package is effectively delivered, with the restrictions outlined below, we can be confident that national funding will effectively reach the local specialist services that need it. We consider that this would largely mean an end to one-off, short term national competition-based funding pots which have been repeatedly launched by government in recent years. These have been severely criticised as not meeting demand, favouring local areas with engaged commissioners who can submit strong bids, requiring a focus on 'new' and 'innovative' projects rather than core service delivery, and further compounding the 'post-code' lottery of provision. Whilst these of course may still be required for responding to specific circumstances and events (such as the COVID 19 pandemic or cost of living crisis), overall we do not consider national competition-based funding to be a fair or effective means of funding local services.

Ring-fenced by & for funding

Separately to funding for specialist women's domestic abuse services, we need ring-fenced funding for services led 'by and for' Black and minoritised women, Deaf and disabled survivors, LGBT+ survivors. It is well evidenced that 'by and for' services are particularly disadvantaged within current procurement processes and are six times less likely to receive statutory funding.⁴⁶ As a result of the complexity of the needs of survivors they support and the specialisms of their staff, 'by and for' services also have higher costs than other specialist domestic abuse services.

⁴⁶ Domestic Abuse Commissioner, 'A Patchwork of Provision: How to meet the needs of victims and survivors across England and Wales', 2022. Available online: <https://domesticabusecommissioner.uk/wp-content/uploads/2022/11/A-Patchwork-of-Provision-Technical-Report-Nov-2022-Final.pdf>

Ring-fenced funding for 'by and for' services is therefore essential to deliver an effective and equitable local funding solution. The Domestic Abuse Commissioner has recommended that government deliver a national ring-fenced fund for 'by & for' services over a three year period, which includes a capacity building programme to improve regional and geographical spread of 'by & for' services, which are very limited outside of London, the South East and Metropolitan areas.⁴⁷ 'By and for' services must co-design and deliver a ring-fenced funding solution, ensuring it effectively covers the cost disparity outlined in section three and sufficient resources for capacity building to improve the provision and geographical spread of services across England.

Cross government definitions and amendments to legislation to ensure funding is delivered to the right services

Cross-government definitions of specialist VAWG services and 'by and for' VAWG services are essential to end the cycle of funding and commissioning challenges these expert services face. These definitions should be developed with the specialist VAWG sector and adhered to across all relevant departments – including DLUHC, the Home Office, Ministry of Justice and the Government Equalities Office. The definition of a specialist organisation must include the following core components:

- Feminist organisations run by women, and for women and their children, and who are independent from the state.
- Organisations whose core business and organisational purpose is to support survivors and/or children and young people impacted by domestic abuse and other forms of violence against women and girls (VAWG).
- Organisations whose services are delivered by specially trained staff, with support that is needs-led and gender-responsive.
- The lived experience of women experiencing domestic abuse or VAWG is represented within the organisation's governance and staffing structures.

These definitions should build from the definitions in the Welsh VAWDSV Commissioning Guidance and align to the Istanbul Convention, Article 22 of which requires the provision of specialist support services. The definitions must also guide amendments to existing legislation on VAWG, discussed in section four. Amendments to the Domestic Abuse Act 2021 are required ensure that funding is awarded to specialist women's refuge services and 'by and for' refuge services. Similarly, the Victim & Prisoners Bill should be amended to ensure that that the duty to collaborate specifies that commissioners should commission "specialist women's and specialist 'by and for' led community-based support services and sexual violence support services".

Robust statutory guidance

Whilst there are positive elements of existing government guidance on VAWG, including for Part 4 of the Domestic Abuse Act 2021, it is not robustly enforced. The inclusion of

⁴⁷ Domestic Abuse Commissioner, 'A Patchwork of Provision: How to meet the needs of victims and survivors across England and Wales', 2022. Available online: <https://domesticabusecommissioner.uk/wp-content/uploads/2022/11/A-Patchwork-of-Provision-Technical-Report-Nov-2022-Final.pdf>

the definitions listed above, and clear mechanisms for ensuring accountability to the guidance, are critical. As noted in section four, linguistic ambiguities in current guidance also make it difficult to understand what decisions can be challenged. Much greater clarity is required on what commissioners 'must' and 'should' do in respect of commissioning domestic abuse services.

As well as covering the types of services that need to be commissioned, revised statutory guidance must also provide more clarity on what effective commissioning for domestic abuse provision means in practice. This must not only list the steps commissioners should take in the process, but cover these essential components:

- Conducting **comprehensive needs assessments**, developed in partnership with local specialist and 'by and for' services, to assess the demographics of those needing support, map existing provision and identify gaps.
- Developing **robust strategies**, based on the results of the needs assessment, which set out a clear plan for the provision of support which meets the needs identified.
- **Effective local partnership** arrangements for responding to domestic abuse and VAWG, which ensure meaningful engagement with local specialist and 'by and for' services and survivors.
- Ensuring **cross-boundary collaboration**, which is critical in the response to domestic abuse, as many survivors leave their local area in order to access safety.
- **Requiring quality standards** – using established accreditation systems in the domestic abuse sector, such as the Women's Aid National Quality Standards and the Imkaan's Accredited Quality Standards, to ensure that services are delivering a good quality service for survivors and their children.
- Using **alternatives to procurement** – guidance should provide clarity on the fact that competitive tendering is not an effective method for commissioning domestic abuse provision and detail the lawful basis of alternative methods of commissioning for domestic abuse service, including grant funding, partnership approaches, low value contract flexibility and the Light Touch Regime. The guidance should recommend against using lengthy and expensive competitive procurement practices (designed to regulate the unfair advantage for businesses and other entities that operate in a competitive market) where they are clearly not needed, such as where there is one single specialist provider able to meet an identified need in a local area.
- **Prioritising real 'value'** - where procurement has to be used, processes must ensure that the true value, which encompasses price, quality and social value, of specialist services are assessed.
- Establishing **longer term contracts** – which have in-built inflationary increases - which are essential for enabling stability in domestic abuse provision, ensuring services can recruit and retain staff, plan ahead and develop their services.
- **Effective and efficient data collection and monitoring** is essential for understanding outcomes and improving service delivery, but it is critical that data collection and monitoring systems build on the mechanisms already in place within

specialist domestic abuse services – such as Women’s Aid On Track case management system⁴⁸ – and that resources are allocated for this purpose.

Accountability

The Domestic Abuse Safe Accommodation National Expert Steering Group (NESG) was set up to monitor the delivery of the Part 4 duties within the Domestic Abuse Act 2021 and is currently the only accountability mechanism focused on the commissioning of domestic abuse services. Whilst processes have been considered for how NESG will respond where local authorities are ‘struggling’ or ‘significant failing’ to deliver the statutory duty⁴⁹, to date NESG has not formally intervened on any concerns related to implementation – despite evidence of local authorities spending statutory duty funding on non-accommodation-based services and their own ‘in-house’ provision. There are no comparable mechanisms for community-based support services – the Home Office VAWG National Statement of Expectations provides guidance only and is not enforced.

The Part 4 duty does enable survivors and domestic abuse services to legally challenge local authorities who aren’t delivering safe accommodation in the manner required by the Domestic Abuse Act, however strategic litigation is costly, risky and resource intensive. It is inappropriate to rely purely on legal challenge as a means of accountability for domestic abuse services, given the barriers they face to pursuing this.

Women’s Aid recommends that a national oversight mechanism is established to provide robust accountability for the provision of support to survivors and their children. This should be led by ministers in relevant government departments and involve the Domestic Abuse Commissioner, Victims Commissioner, and national specialist domestic abuse and ‘by and for’ organisations. It would provide a number of critical functions:

- **Data and reporting:** building on the important improvements to national data delivered by NESG, a national oversight mechanism would have responsibility for both collecting and reporting on data related to the delivery of domestic abuse duties at local level - including clarity on the types of service provider that are funded and to what extent, as well as on the types of support provision, the number of survivors supported, those refused, and relevant protected characteristics of survivors and their perpetrators.
- **Oversight of the national network of domestic abuse services:** it is well established that women need to access domestic abuse services, particularly refuges, from outside of their local area and as such domestic abuse services cannot only be assessed, planned, commissioned or funded on the basis of local need alone. In addition, ‘by and for’ services face severe challenges in a fully

⁴⁸ On Track is Women’s Aid’s case management and outcomes monitoring system. The system is used by over 100 local domestic abuse services to record information about service users they work with.

⁴⁹ Domestic Abuse Safe Accommodation: National Expert Steering Group, ‘Helping Local Authorities to succeed in delivering their duties under Part 4 of the Domestic Abuse Act 2021’, Draft paper for June 2022 meeting.

localised funding systems, as they are often run across different local authorities and meet the needs of survivors across wider geographic areas. The need for these services may therefore not be identified in local needs assessments at all, but they are a vital national resource. The national oversight mechanism would therefore have responsibility for undertaking a national needs assessment for refuge services, including provision for survivors with protected characteristics.

- **Intervention:** intervening where local authorities were not adhering to legislation, statutory guidance and international law on the provision of domestic abuse services, including compliance with the Domestic Abuse Act, Victim & Prisoners Bill, Equality Act and Public Sector Equality Duty, and the Istanbul Convention. A package of interventions would be required and should include: recommendations for improvements within a specified timescale; direction to pause or revise procurement and commissioning processes; inspections into a local authority at risk of failing in its 'best value' duty⁵⁰; and direct interventions, such as improvement boards or recommissioning decisions, where required. This would be a critical means of holding local commissioners accountable for funding specialist, high quality services which are sex or gender specific, which meet the needs of women and children experiencing domestic abuse – including those with additional protected characteristics.

B. Locally

Local funding delivery, partnership and strategies

Local funding for domestic abuse services is currently complex and brought together from a range of sources. With local authorities, Police and Crime Commissioners and Integrated Care Boards required to collaborate in the commissioning of domestic abuse services under the Victim and Prisoners Bill, and local authorities required to fund domestic abuse support in safe accommodation, there will be clearer local pathways for funding delivery from 2025.

The exact composition for various elements of service provision of funding will differ at local level, according to the needs assessments required under Part 4 of the Domestic Abuse Act and Part 12 of the Victim and Prisoners Bill. These needs assessments will require commissioners to assess the demographics of those needing support, map existing provision and identify needs and gaps. Comprehensive needs assessments must always be developed in consultation with both commissioned and non-commissioned providers – including 'by and for' specialist services - operating in the local area to understand the level and types of need, including needs of survivors who come from outside the area. These services are experts in local need and priorities for delivering support, holding valuable knowledge on how to achieve the best outcomes

⁵⁰ Under the Local Government Act 1999, the Secretary of State has the power to commission an inspection into a local authority which is at risk of failing in its 'best value' duty. The best value duty is usually taken to include producing a balanced budget, providing statutory services, and securing value for money in spending decisions.

for survivors in their areas. Their expertise should be valued, and properly resourced, within the process.

Following needs assessment, the three commissioning bodies should be responsible for delivering sustainable funding for the following essential elements of the domestic abuse response:

- Refuge services and other forms of safe accommodation
- Outreach, floating support and advocacy services
- Therapeutic support
- Dedicated support for children and young people
- Community outreach support, including education, awareness raising and training professionals.
- Specialist 'by and for' services for Black and minoritised women, LGBT+ survivors and d/Deaf and Disabled women.

The local strategies required under Part 4 of the Domestic Abuse Act and Part 12 of the Victims and Prisoners Bill must set out clearly how the above elements of service provision will be funded by respective local commissioners. These strategies should be clear and detailed plan for commissioners will provide the above support services for survivors, as identified in their needs assessment. They should fit within a comprehensive approach to tackling VAWG at the local level.

The local partnership boards and collaboration mechanisms also required under these legal duties will be responsible for ensuring that the above elements of service provision are met effectively. Partnership board meetings should always include representatives of specialist domestic abuse services, 'by and for' services and survivors, and be collaborative forums where all stakeholders have a voice. They must take place regularly, be formally minuted and follow transparent decision-making processes. The collaboration required under Part 12 of the Victims and Prisoners Bill should ensure effective cross-boundary collaboration between local authorities across PCC regions, ensuring needs assessments, strategies and commissioning timelines are effectively aligned.

Commissioning to give effect to the strategies must follow the requirements which are recommended for revised statutory guidance above – including the use of established quality standards within the domestic abuse sector, using flexible commissioning approaches and alternatives to procurement, prioritising 'real value' if procurement has to be used, delivering longer term contracts with in-built inflationary increases and undertaking effective and efficient data collection and monitoring.

There should be a clear process for any local partner to raise concerns about the effectiveness of local needs assessments, strategies, partnership boards or commissioning approaches with the national oversight mechanism outlined above, who would be responsible for investigating further and taking action where required.

7. Limitations and further data and research required

Limitations

As noted in section two, the current lack of transparency on public sector investment in domestic abuse support means that Women's Aid's review of current government spending is limited. Our estimate is based on national government reported spending and does not account for additional spending from local authority revenue support grants or funding from health bodies. Whilst a fuller picture of local spending on domestic abuse support services could be developed using FOI requests and the financial accounts of relevant commissioners and service providers, this would take a significant level of resource and would still likely be an incomplete analysis. In some cases we have also had to estimate annual spend based on divisions of multi-year funding streams, and in others it has not been possible to disaggregate funding streams which cover sexual violence and services in Wales. Our estimates of government spending are based on the public information available, which we note is severely limited.

Women's Aid's recommendation of £427million for specialist women's domestic abuse services in England is also based on a number of pre-requisites which must be in place for this amount to resource the sector as required. These are:

- **Additional ring-fenced funding for 'by and for' services** – to cover cost disparities and capacity building and development to support equitable provision across the country.
- **Provision for women with no recourse to public funds (NRPF)** – the insurmountable barriers that women with NRPF currently face to accessing safety and support must end to ensure services can support them equally. We continue to call for all migrant survivors to be able to access the Destitute Domestic Violence Concession (DDVC) and Domestic Violence Indefinite Leave to Remain Rule (DVILR).
- **Availability of the full range of service types in the sector** – recognising that refuge and the range of support services delivered in the sector are inter-dependent, respond to women and children's varying and changing support needs, and that all require sustainable investment. We did also not included funding for open access services (such as local helplines and live chat services), perpetrator programmes and national support services and programmes in our estimate, which are all critical parts of the wider domestic abuse response.
- **Effective, sustainable funding of the wider support sector** – the domestic abuse sector does not exist in isolation and works in partnership with a range of agencies and partners to meet women and children's needs, including the wider VAWG sector and health, housing, welfare, money and debt, employment and careers and the justice system.
- **Availability of housing benefit** – Women's Aid has not included the housing costs within refuges, which are largely met within housing benefit, within our

estimate as this derives from revenue benefits spending. This is an essential component for the sustainability of refuges and must continue to be in place.

- **Funded coordination and oversight** – the estimate covers funding required for local specialist domestic abuse services, but national infrastructure support, including to provide quality standards and accredit services, support with case management and monitoring, and research to review the capacity and needs of the sector, are also essential.

Additionally, our estimates of the spend required for services are based on average costs which we recognise do not account for the differences between cohorts of women and the varying levels of their support needs. For example, a young woman with a baby will have very different needs for staff contact hours than an older mother with school-aged children. Women with significant mental health or substance use support needs may require 24-hour contact from support staff. These limitations are further explored in our 2019 'Funding Specialist Support for Domestic Abuse Survivors' report.⁵¹

Further research required

Alongside urgently delivering the £427million required for specialist women's domestic abuse services and implementing the recommended changes to the funding model for the sector, we recommend that the next government should commission an immediate review of funding for local and national domestic abuse, and other forms of VAWG, support services. This is essential to ensure there is an accurate and robust understanding of who is funding what to determine need and resources in the long term.

A comprehensive review of spending must include: total local authority spending, including the revenue support grant; total PCC spending; total spending by ICBs, NHS Trusts and NHSE on domestic abuse support services; and national government spending on local and national domestic abuse services. For all of the above, the analysis would need to disaggregate between funding awarded to specialist domestic abuse services, 'by and for' services, generic services and in-house statutory services. We recommend that such a review could be undertaken by the National Audit Office.

As noted in section two, we also recommend an evaluation of wider government programmes that impact on survivors of domestic abuse but haven't been developed with domestic abuse expertise or where there are concerns about their safety, efficacy or impact.

⁵¹Women's Aid, 'Funding Specialist Support for Domestic Abuse Survivors', 2019. Available online: <https://www.womensaid.org.uk/wp-content/uploads/2019/12/Funding-Specialist-Support-Full-Report.pdf>, accessed 20 May 2024.

8. Glossary

Survivor

At Women's Aid, we use the term 'survivor' rather than 'victim' as it speaks to the strength of people experiencing domestic abuse, is less criminal justice focused and more empowering.

VAWG

Violence Against Women and Girls (VAWG) is the term given to all forms of violence and abuse experienced disproportionately by women and girls, or experienced by them because of their gender, including domestic abuse, rape and sexual violence forced marriage, 'honour' based abuse, female genital mutilation (FGM) and sexual harassment. The United Nations states that violence against women is a "*manifestation of historically unequal power relations between men and women, which have led to domination over and discrimination against women by men and to the prevention of the full advancement of women.*"⁵²

Specialist women's domestic abuse service

Women's Aid defines specialist women's domestic abuse services as run by women's, feminist organisations. They are run by women, and for women and their children. Their core business and organisational purpose it is to support survivors and/or children and young people impacted by domestic abuse and other forms of violence against women and girls (VAWG). The services they deliver are specifically designed to support women and children affected by domestic abuse, sexual violence and/or other forms of VAWG. For the full definition, see Appendix D of Women's Aid's Annual Audit Report 2024.

Specialist 'by and for' service

Women's Aid defines specialist 'by and for' services as run by and for the communities they serve, such as for Black and minoritised women, Deaf and disabled women and LGBT+ survivors. In doing so they offer a uniquely empowering experience to the communities they support, as the client group is reflected in staffing, management, and governance structures of these organisations. Specialist 'by and for' services have emerged as distinct from wider specialist services, in that they are led by, and seek to support, further minoritised and marginalised groups. For the full definition, see Appendix D of Women's Aid's Annual Audit Report 2024.

Generic domestic abuse service

Women's Aid defines 'generic' domestic abuse services as those delivered by organisations who have a wider remit than domestic abuse alone.

⁵² United Nations, Declaration on the Elimination of Violence against Women, Proclaimed by General Assembly resolution 48/104 of 20 December 1993.

'In house' domestic abuse service

Women's Aid defines 'in house' domestic abuse services as those run by statutory agencies, such as local authorities, health bodies or the police.

Part 4 statutory duty

Part 4 of the Domestic Abuse Act 2021 (Sections 57-61) placed new duties on Tier 1 local authorities in England relating to the provision of domestic abuse support for victims and their children residing within relevant safe accommodation and a duty on Tier 2 authorities to co-operate with Tier 1 authorities. The Part 4 statutory duties require Tier 1 local authorities to: assess need and demand for accommodation-based support to meet the needs of victims and their children; develop and publish a strategy for the provision of support to cover the local area; deliver this strategy (through funding and commissioning decisions), monitor and evaluate local delivery and report back to central Government; and appoint a multi-agency local partnership board, which it must consult with as it delivers the duty.

Commissioning

Commissioning takes place first. It is the strategic process whereby public sector organisations decide what services or products they require and what services they should be buying to meet their priorities and people's needs. It is a strategic approach that considers the needs of people and is focused on delivering meaningful outcomes. Commissioning can involve using different ways of paying organisations for the work they do, including through grants and agreements for the organisation to do certain types of work or provide a certain type of service.

Procurement

Procurement is a process by which a public sector organisation purchases services from an organisation (i.e. a social enterprise, a charity, a business or other). It involves buying the services and issuing a contract to the provider in order to make this process legally binding. Competitive tendering is part of the procurement stage – it is a formal process by which organisations compete for funding available to deliver public services by submitting tender applications.

Istanbul Convention

The Council of Europe Convention on preventing and combating violence against women and domestic violence (the Istanbul Convention) requires parties to develop laws, policies and support services to end violence against women and domestic violence. The UK signed the Istanbul Convention in 2011, ratified it in 2022 and it officially came into force in the UK on 1st November 2022.

Refuge service

A refuge service offers accommodation and support only for women experiencing domestic abuse which is tied to that accommodation. The address will not be publicly available. It will have a set number of places. Residents will receive a planned programme of therapeutic and practical support from staff and access peer support from other residents. For the full definition, see the glossary in Women's Aid's Annual Audit 2024.

Community-based support (CBS) services

Community-based support services are offered to women and children experiencing domestic abuse living in the local area that are not resident in refuge, and include floating support, outreach, advocacy services – including Independent Domestic Violence Advocate or Advisor (IDVA) services – therapeutic support such as formal counselling and support groups, and dedicated support for children and young people. It can also include community-based outreach – such as prevention, education and awareness raising.

Open access services

There are a range of domestic abuse services which are available without a referral process and are 'open access'. This can include helplines, online chat services and both online and in-person advice and drop-in services or fora.

IDVA

Independent Domestic Violence Advisors (IDVAs) are a form of domestic abuse advocacy service. Domestic abuse advocacy involves the provision of advice, information and support to survivors based on an assessment of risk and its management. IDVAs are usually part of a multi-agency risk management strategy or MARAC (multi-agency risk assessment conference) process. They focus on providing a service to victims judged to be at medium to high risk of harm to address their safety needs and help manage the risk that they face.

DASH

The Domestic Abuse, Stalking, Harassment and Honour Based Violence (DASH) Assessment is a risk assessment which aims to identify those who are at high risk of harm. It is typically used to determine who should be referred to a Multi Agency Risk Assessment Conference (MARAC) process in order to manage risk and is also used as a common risk assessment tool by domestic abuse practitioners and organisations.