

## Domestic Abuse Commissioner submission to the HM Treasury Autumn Budget and Spending Review 2021 - Representations

### Contents

<b>The role of the Domestic Abuse Commissioner</b> .....	2
<b>Summary</b> .....	2
<b>Current funding landscape for domestic abuse services</b> .....	4
<b>Summary of the funding landscape over the past four years</b> .....	4
<b>Current challenges for local areas with regards to funding</b> .....	5
<b>How much does domestic abuse cost the government</b> .....	6
<b>Impact of the Covid-19 pandemic on the demand for domestic abuse services</b> .....	7
<b>Estimating the current funding gaps</b> .....	9
<b>What does the Domestic Abuse Commissioner’s mapping research tell us about the current provision and funding of domestic abuse services?</b> .....	10
<b>Introduction</b> .....	10
<b>Who responded to the survey?</b> .....	11
<b>What types of services do organisations provide?</b> .....	12
<b>Funding for community-based and accommodation-based services</b> .....	13
<b>The role of by and for organisations</b> .....	13
<b>Funding for community-based services</b> .....	14
<b>Recommendations</b> .....	16
<b>Dedicated funding for specialist by and for services</b> .....	16
<b>Family courts</b> .....	21
<b>Dedicated funding to support survivors with no recourse to public funds</b> .....	24
<b>National roll out of a whole-health approach</b> .....	25
<b>Rebuilding your life grant, a local emergency fund to enable victims and survivors to rebuild their lives after fleeing domestic abuse or leaving a refuge</b> .....	26

<b>Specialist mental health support</b> .....	28
<b>Behaviour change and intervention programmes for those who perpetrate domestic abuse</b> .....	30
<b>Domestic homicides and suicide oversight mechanism</b> .....	32
<b>Appendix 1 legal aid costs</b> .....	33
<b>Appendix 2: Domestic Abuse Commissioner’s Office Mapping – project timeline</b> ...	33
<b>Appendix 3 Calls to the National Domestic Abuse Helpline and Men’s Advice Line</b>	34

## The role of the Domestic Abuse Commissioner

The Domestic Abuse Act establishes in law the Office of the Domestic Abuse Commissioner to provide public leadership on issues relating to domestic abuse and to play a key role in overseeing and monitoring the provision of domestic abuse services in England and Wales. The role of the Commissioner is to encourage good practice in preventing domestic abuse and improve the protection and provision of support to people affected by domestic abuse by holding both national and local government to account in their response.

### Summary

**Domestic abuse has both a significant economic cost for government and personal human cost for individuals.** Domestic abuse affected 2.3 million adults<sup>1</sup> in the last year and represents one-third of violent crime recorded by the police.<sup>2</sup> Approximately one-fifth of all adult homicides (and half of adult homicides where the victim is female), are domestic homicides.<sup>3</sup> The Home Office has estimated that domestic abuse has an economic and social cost of around £74 billion in England and Wales each year.<sup>4</sup>

**The Spending Review provides an opportunity to increase investment in specialist, preventative interventions that are essential in ensuring that victims and survivors receive the most appropriate and effective form of support as well as managing longer term costs for Government.**

**This submission sets out an indication of current levels of demand for domestic abuse support, and a summary of the funding position of the specialist services that provide the most effective and holistic interventions to enable victims to escape abuse and rebuild their lives.** This submission draws upon evidence spanning the last four-year Spending Review period as well as more recent data on the increased demand for services as a result of the Covid-19 pandemic. Based on an analysis of trends over the course of the pandemic, the Commissioner anticipates that demand for services will remain higher than pre-March 2020 levels for at least the next three years.

**This submission also draws heavily upon early findings from the Domestic Abuse Commissioner’s research to map and monitor the provision of domestic abuse services in England and Wales.** This task was established through the Domestic Abuse Act and will be a significant step in evidencing and addressing the postcode lottery in

<sup>1</sup> Office of National Statistics (ONS) (November 2020), Domestic abuse prevalence and trends, England and Wales: year ending March 2020 [Domestic abuse prevalence and trends, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/domestic-abuse-prevalence-and-trends)

<sup>2</sup> Office for National Statistics (ONS), The nature of violent crime in England and Wales: Year ending March 2020, Section 7, Groups of people most likely to be victims of violent crime.

<sup>3</sup> ONS, [Homicide in England and Wales: year ending 2019](https://ons.gov.uk/homicide-in-england-and-wales).

<sup>4</sup> Home Office (July 2021), Tackling violence against women and girls strategy, [Tackling violence against women and girls strategy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/tackling-violence-against-women-and-girls)

support for victims and survivors, their children, and perpetrator interventions. This mapping research consists of: a feasibility study in early 2021 to map provision in four local authority areas, work to identify more than 600 organisations across England and Wales, a service provider survey in July 2021 and detailed analysis of responses, and engagement with victims and survivors of domestic abuse to understand their experience in accessing services. As the mapping work and data assurance is not complete, all data and findings are provisional and subject to completion of the final mapping report in 2022.

**Based on this evidence, the submission sets out the case for greater investment in specialist community-based services.** Domestic abuse services are broadly categorised as either accommodation-based or community-based services. Accommodation-based support is delivered to victims and survivors in a residential setting which is specifically designed to meet the needs of that group. This could include for example refuge accommodation. Community-based services are provided to people outside of a residential setting and include for example specialist advocacy support, welfare and immigration advice and mental health support. There is often a high level of overlap between these two services, with, for example, community-based services making referrals for victims into refuge accommodation. Seventy per cent of victims of domestic abuse who access support do so via community-based services, many of whom will never need to access higher cost refuge accommodation if the interventions are successful.<sup>5</sup> It should also be noted that community-based services receive a high level of referrals from statutory services, and are often the service that refers victims and survivors into refuge accommodation. However, whilst the funding landscape for these services has been as fragile as accommodation-based services over the last ten years, there remains no statutory underpinning for the funding of this form of service. The Commissioner therefore calls upon the Treasury to allocate sufficient funding to underpin a new legal duty on relevant public bodies to deliver community-based services in the forthcoming Victim Bill, which is expected to come before Parliament late this year.

**Beyond this broader ask, the Commissioner has drawn upon the evidence from the mapping research and evidence from specialist domestic abuse services to call for increased investment in specialist, targeted forms of community-based interventions.** This submission focuses on early preventative solutions and highly specialist forms of support for groups who face the greatest barriers to accessing mainstream services.

Intervention	Projected costs
Dedicated funding for specialist by and for services to support Black and minoritized, Deaf, disabled and LGBT+ survivors	£87,633,493 per annum £262,900,480 over three years
The establishment of a monitoring mechanism in the family courts	£150,000 for the first year  Further funding will be needed within the Spending Review period for the mechanism to operate on an ongoing basis following the initial one-year phase.
Specialist domestic abuse training for judges and lawyers in the family court	£1.5 million per annum is needed to provide culture change training to the judiciary  £4.5m over three years

<sup>5</sup> SafeLives (April 2020), Briefing for the Second Reading of the Domestic Abuse Bill, [SafeLives Briefing for Second Reading of DA Bill 28.04.20\\_0.pdf](#)

Specialist support for victims and survivors going through the family courts process	£23.8 million per annum
Non-means tested legal aid for survivors of domestic abuse and private law family proceedings	£76m - 114m per annum
Dedicated funding for survivors with no recourse to public funds status	£6.2 million per annum £18.7m over three years
National roll out of a whole health approach to preventing and tackling domestic abuse	£2,398,000 over three years
A “Local Emergency Fund” to enable victims and survivors to rebuild their lives after fleeing domestic abuse or leaving refuge	£3.6m per annum £10.7m over 3 years
Specialist mental health support for victims and survivors	£5.4million per annum £16.2 million over three years.
Behaviour change and intervention programmes for those who perpetrate domestic abuse	MATAC model: £22.6 million for the first year Drive: £12.9 million per year
Funding for a domestic homicides and suicide oversight mechanism to prevent future deaths	£99,874 per annum £299,622 over three years

## Current funding landscape for domestic abuse services

### Summary of the funding landscape over the past four years

**The last Spending Review (2015-2020) committed £100m of dedicated national spending to tackle all forms of Violence Against Women and Girls, including domestic abuse.** Furthermore, an additional £125 million has been allocated to tier one local authorities to ensure that they are able to meet the new duty contained in Part 4 of the Domestic Abuse Act (2021) to deliver support to victims of domestic abuse and their children in safe accommodation during the financial year 2020/21. In addition, emergency funding of £44 million has been provided by national government (the Home Office, Ministry of Justice and the Department for Levelling up, Housing and Communities) for the provision of community-based services, national helplines and emergency accommodation for those fleeing domestic abuse during the Covid-19 pandemic.

**This funding has been extremely welcome, however, the scale and prevalence of domestic abuse, as well as the impact of the Covid-19 pandemic means that the demand for services still far outstrips provision of the most tailored, holistic forms of support to victims and survivors.** A failure to invest in these services can lead to further

long-term costs for the government. Research shows that eighty-five per cent of victims of domestic abuse seek help five times on average before they get effective support.<sup>6</sup>

### **Current challenges for local areas with regards to funding**

**There has been a significant decline in the amount of statutory funding available for specialist domestic abuse services at a local level over the past ten years.** Of 178 authorities that responded to FOI requests in 2018, 65% had cut funding for refuges in real terms since 2010, amounting to an average fall for each of £38,000, or £6.8m in total.<sup>7</sup> FOI requests to all London councils found that refuges led ‘by and for’ Black and minoritised women lost around half of their annual council funding between 2009 and 2016.

**The Women’s Aid report, *Fragile funding landscape*, found that the commissioned refuge sector in England is currently supported by a significant number of services that receive no statutory funding.**<sup>8</sup> More than one in five refuge services running in November 2020 (60 out of 269 refuge services) were not commissioned by the local authority and were funded through emergency government funding pots, charitable grants, trusts and other fundraising activities. The same report found that non-commissioned services ran 57.5% of all refuge spaces in specialist ‘by and for’ services, compared to the overall 18.5% of all non-commissioned refuge spaces, highlighting the particular challenges specialist by and for services encounter.<sup>9</sup> The report recommended that the government and the Domestic Abuse Commissioner work in partnership with the ‘by and for’ sector – including those representing services working ‘by and for’ BME women, LGBT survivors and survivors who are disabled, Deaf or blind – to develop the ring-fenced funding settlement, and model of delivery, required for specialist provision for groups with protected characteristics. The implementation of the forthcoming duty on Tier one local authorities to commission accommodation-based services is very welcome, and the Commissioner hopes that this will help to ensure that a higher level of statutory funding is provided to these services. Robust national coordination of this funding will be essential to ensure that it reaches specialist gender-informed services and specialist by and for services for victims and survivors who face barriers to accessing mainstream services. Furthermore, as outlined below, this duty is not extended to community-based services and the Commissioner is concerned that this could lead to a loss in statutory funding for these interventions.

**There is strong evidence to suggest that specialist organisations are disadvantaged by local commissioning structures.** A recent report from Comic Relief, who have considerable experience in commissioning specialist domestic abuse services, also found several key blockages to accessing funding. These included partnership and power dynamics at the local level, the cost-focused competitive tendering processes and challenges in communicating value, an overemphasis on project-and innovation-focused

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<sup>6</sup> SafeLives (2016) *A Cry for*

*Health*: [http://www.safelives.org.uk/sites/default/files/resources/SAFJ4993\\_Themis\\_report\\_WEBcorrect.pdf](http://www.safelives.org.uk/sites/default/files/resources/SAFJ4993_Themis_report_WEBcorrect.pdf)

<sup>7</sup> The Guardian (March 2018), “Council funding for women’s refuges cut by nearly £7m since 2010”

<https://www.theguardian.com/society/2018/mar/23/council-funding-womens-refuges-cut-since-2010-england-wales-scotland>

<sup>8</sup> Women’s Aid. (2021) *Fragile funding landscape: the extent of local authority commissioning in the domestic abuse refuge sector in England 2020*, Bristol: Women’s Aid. <https://www.womensaid.org.uk/wp-content/uploads/2021/02/Fragile-funding-landscape-the-extent-of-local-authority-commissioning-in-the-domestic-abuse-refuge-sector-in-England-2020.pdf>

<sup>9</sup> Women’s Aid. (2021) *Fragile funding landscape: the extent of local authority commissioning in the domestic abuse refuge sector in England 2020*, Bristol: Women’s Aid. <https://www.womensaid.org.uk/wp-content/uploads/2021/02/Fragile-funding-landscape-the-extent-of-local-authority-commissioning-in-the-domestic-abuse-refuge-sector-in-England-2020.pdf>

funding and a bias against smaller/less established organisations because of complex application processes and lack of support to complete these.<sup>10</sup>

**These funding challenges are particularly acute for the smaller specialist “by and for” sector, and urgent investment and coordination is required by national government to build capacity and provide access to the most marginalised and minoritized groups.**

Too often local commissioners may lack the understanding, or capacity, to commission specialist services that meet the diverse needs of their populations, and favour fewer, larger contracts. It is also the case that local commissioning frameworks may encourage one single service to provide services across a local area, which specialist by and for services would be ineligible for. What is more, local commissioning structures often discourage commissioning of some specialist services where there may not be a critical mass of service users within a defined geographical area. In addition, a larger more generic service may be able to undercut ‘by and for’ services, despite providing less effective support that meets the needs of the most marginalised service users. Forthcoming independent research on the impact of Covid-19, found that 75% of Imkaan members entered the pandemic with less than three months reserves. A 2016 report from Imkaan reported that in the space of a year, 50% of Black and minoritised women’s specialist refuges were forced to close or were taken over by a larger provider due to lack of funding over the last decade, while others continue to operate without any local government support.<sup>11</sup> There are currently only 36 refuge services across England which provide specialist support for these groups of victims and survivors who request specialist “by and for provision.”<sup>12</sup> The majority of these services are based in London. Urgent investment and coordination is required by national government to help build the capacity of these organisations to boost access to this very specialist support for victims and survivors across the country.

### **How much does domestic abuse cost the government**

**Domestic abuse affected 2.3 million adults<sup>13</sup> in the last year and represents one-third of violent crime recorded by the police.**<sup>14</sup> Approximately one-fifth of all adult homicides (and half of adult homicides where the victim is female), are domestic homicides.<sup>15</sup> The police recorded 758,941 domestic abuse-related crimes in England & Wales in the year ending March 2020.<sup>16</sup>

**In 2019, the Home Office published extensive evidence on the social and economic costs of domestic abuse.** Overall, in the year ending 31 March 2017, domestic abuse was estimated to have cost over £66 billion in England and Wales.<sup>17</sup> These costs are estimated by the Home Office to be around £74 billion in today’s prices.<sup>18</sup> The biggest component of the estimated cost was the physical and emotional harms incurred by victims (£47 billion), particularly the emotional harms (the fear, anxiety and depression experienced by victims as a result of domestic abuse), which account for the overwhelming majority of the overall costs. The cost to the economy is also considerable, with an estimated £14 billion arising

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<sup>10</sup> University of Suffolk (2020), *Mapping the VAWG funding ecosystem in England and Wales* <https://www.uos.ac.uk/sites/www.uos.ac.uk/files/Mapping%20VAWG%20funding%20ecosystemFINAL.pdf>

<sup>11</sup> Imkaan (2016), *Capital Losses*. London: Imkaan

<sup>12</sup> Women’s Aid (2021) *The Domestic Abuse Report 2021: The Annual Audit*, Bristol: Women’s Aid. [The Domestic Abuse Report - Womens Aid](#)

<sup>13</sup> Office of National Statistics (ONS) (November 2020), Domestic abuse prevalence and trends, England and Wales: year ending March 2020 [Domestic abuse prevalence and trends, England and Wales - Office for National Statistics \(ons.gov.uk\)](#)

<sup>14</sup> Office for National Statistics (ONS), The nature of violent crime in England and Wales: Year ending March 2020, Section 7, Groups of people most likely to be victims of violent crime.

<sup>15</sup> ONS, [Homicide in England and Wales: year ending 2019](#).

<sup>16</sup> ONS, Domestic abuse and the criminal justice system, England and Wales: November 2020 [Domestic abuse and the criminal justice system, England and Wales - Office for National Statistics \(ons.gov.uk\)](#)

<sup>17</sup> Home Office (January 2019), The economic and social costs of domestic abuse

<sup>18</sup> Home Office (July 2021), *Tackling violence against women and girls strategy*, [Tackling violence against women and girls strategy - GOV.UK \(www.gov.uk\)](#)

from lost output due to time off work and reduced productivity as a consequence of domestic abuse. Some of the cost will be borne directly by Government, including the costs to health services (£2.3 billion) and the police (£1.3 billion). Some of the cost of victim services will also fall to Government, including housing costs totalling £550 million, which includes housing benefit spend on temporary housing, homelessness services and repairs and maintenance. The estimated cost for a single victim of domestic abuse is £34,015. While this represents an average, there are a range of different types of violent and sexual offences that victims of domestic abuse can experience. Most extreme is the cost of domestic homicide, which has an estimated unit cost of £2.2 million arising from the cost of harms, health services and lost output.

**Analysis conducted by SafeLives in preparation for the HMT Spending Review 2021, examined the economic, human and emotional cost of domestic abuse for children, indicating the significant cashable savings that could be made through more thoughtful, integrated intervention, at the earliest opportunity.** It is estimated that 27% of children who develop a mental health condition do so as a result of primarily being exposed to domestic abuse. Given that the unit cost per child experiencing a mental health problem per year is £32,000 (based on the average duration of domestic abuse and mental health consequences) SafeLives have assessed the economic impact of domestic abuse is calculated to be £373 million per year. Similarly, 22% of children who develop physical aggression have been exposed to domestic abuse. Given that the unit costs per child demonstrating physical aggression is calculated at £28,000 (based on school dropout rate which has a lifetime economic cost of £186,000), this costs the government £296 million per year. SafeLives research estimates that the median average length of abuse before Marac referral is three years. Taking into account the costs of mental health support, police referrals, youth crime costs, children social care and education disruption ahead of this three year point, their research estimated the potential of a £508 million cashable saving if early, effective interventions are put in place.

### **Impact of the Covid-19 pandemic on the demand for domestic abuse services**

**Since the start of the Covid-19 pandemic, there has been a significant increase in the number of people reaching out to domestic abuse services for support, and in the severity and complexity of the abuse suffered.** While Covid-19 has not in itself caused domestic abuse, what the very necessary public health measures have done is to create a conducive context for it to happen. For many, this period has led to an escalation of violence and abuse, closed routes for people to escape safely and made it more challenging to bring perpetrators to justice.

**Ninety per cent of specialist services reported increased demand since the Covid-19 Pandemic.**<sup>19</sup> A survey conducted by SafeLives during the pandemic with frontline domestic abuse services found that almost a quarter (24%) were concerned about the possible increase to referrals once lockdown starts to ease and over one third (38%) had seen an increase to caseloads.<sup>20</sup> The majority of those (83%) said this was due to an increase in numbers of clients being referred, an increase from 73%. Women's Aid's Perfect Storm report on the impact of Covid-19 found that over three quarters of survivors (78.3%, 36 out of 46) of those living with an abuser said they felt they could not leave or get away because of

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<sup>19</sup> SafeLives (2021), *Practitioner survey 2020/21*, [SafeLives practitioner survey | Safelives](#)

<sup>20</sup> SafeLives (2020), *Safe at Home: Domestic abuse frontline service COVID-19 survey results for June 2020* [Safe at Home Front Line 20200615.pdf \(safelives.org.uk\)](#)

the pandemic.<sup>21</sup> 91% of respondents currently experiencing domestic abuse said the Covid-19 pandemic had negatively impacted in at least one way. Of those women living with their abuser during lockdown, 61% said the abuse had worsened. More than two-thirds (68%) said they felt they had no one to turn to during lockdown.<sup>22</sup>

**Frontline domestic abuse services are overwhelmingly reporting that survivors have higher and more complex support needs.** This is in part because people are facing difficulties accessing statutory support such as mental health services. During the Covid-19 pandemic, the Commissioner has convened regular meetings to bring together frontline domestic abuse services, officials from central government departments, the police and local government in order to ensure that information from the frontline was being fed back to government as quickly as possible in order to help shape the emergency policy response. During these meetings we have consistently heard reports from domestic abuse services that other agencies, owing to the significant demands for their support, are reportedly ‘stepping back’ from supporting victims of abuse, particularly mental health and drug and alcohol services. This leaves specialist domestic abuse services to ‘pick up the pieces’ and consequently their caseloads have become more complex, with lengths increasing as a result. This is supported by reports from domestic abuse helplines who have reported longer call times owing to the complexity of cases.

**The already precarious funding situation for specialist domestic abuse services has caused greater uncertainty for organisations throughout the Covid-19 pandemic.** Research from SafeLives with frontline practitioners in June 2020 found that many services were already experiencing financial difficulties. Over half said that this was due to funding opportunities having dried up, and almost one in six (16%) due to local commissioning changing due to Covid-19.<sup>23</sup> Comments from practitioners highlighted that the funding pots they would usually apply to in order to fund core services had become Covid-19 specific, leaving their service ineligible.

**The increase in demand for support from victims has been sharpest in ‘by and for’ services for the most marginalised survivors, where specialist services have experienced up to a 49% rise in demand.** We welcome the emergency funding from national government. However, the surge in demand for services has further exposed the vulnerability of the sector with regards to funding, with many services still struggling to cope with the increased number of survivors requiring support. Independent research carried out for Imkaan on the impact of Covid-19 found that 75% of their members entered the pandemic with less than three months reserves.<sup>24</sup>

**While the additional Covid-related funding from the Government has now ceased, demand remains far higher than pre-pandemic levels.** The increase in demand for domestic abuse support is starkly reflected in helpline data, and levels remain very high

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<sup>21</sup> Women’s Aid (2020), *A Perfect Storm*, <https://www.womensaid.org.uk/wp-content/uploads/2020/08/A-Perfect-Storm-August-2020-1.pdf>

<sup>22</sup> <sup>22</sup> Women’s Aid (2020), *A Perfect Storm*, <https://www.womensaid.org.uk/wp-content/uploads/2020/08/A-Perfect-Storm-August-2020-1.pdf>

<sup>23</sup> SafeLives (2020), *Safe at Home: Domestic abuse frontline service COVID-19 survey results for June 2020* [Safe at Home Front Line 20200615.pdf \(safelives.org.uk\)](https://www.safelives.org.uk/wp-content/uploads/2020/06/Safe-at-Home-Front-Line-20200615.pdf)

<sup>24</sup> Imkaan unpublished research

following the easing of restrictions. For the period 1 April to 31 December 2020, the average number of weekly calls to the National Domestic Abuse Helpline run by Refuge increased by 34% compared to the same period in 2019 (2,938 p/week in 2020 v 2,191 p/week in 2019). Demand further increased to an average of 3,315 calls per week between week commencing 4 January 2021 and 12 July 2021. In the six weeks since the majority of Covid-19 restrictions were lifted in England (19 July 21 to 23 Aug 21), an average of 3,198 calls have been per week - 46% above the Apr-Dec 2019 pre-pandemic baseline. Similar patterns follow for the Men's Advice Line, which saw a 50% increase in average weekly calls across the same period.<sup>25</sup> We know that helplines are often just the first step to accessing support, and the pressure on community-based services will be felt for years to come.

**The pandemic will have a significant long-term impact on the nature and rates of domestic abuse over the course of the Spending Review period.** The sharpest surges in demands for domestic abuse services have followed the periods of the tightest national lockdown restrictions. Research from the Home Office in 2019 found that the average length of abuse for a victim is three years, before they are able to access support.<sup>26</sup> We also know that the length of time taken for a survivor of domestic abuse to be able to access support will vary across different groups. For example, for disabled survivors, many of whom have been shielding throughout this period and face some of the highest levels of exclusion from mainstream services, we expect this period to be longer.

**Strengthening the vital infrastructure of specialist domestic abuse services must therefore be considered an essential element of the Government's plans to build back better as we move out of the Covid-19 pandemic.**

### Estimating the current funding gaps

**There has been extensive research carried out by specialist services working in the domestic abuse sector to calculate the additional investment required to deliver a sufficient level of tailored support services to meet the needs of victims and survivors of domestic abuse.** Whilst this submission goes on to make targeted recommendations regarding investment in specific interventions, the Commissioner believes that these estimations provide an informative context on the total level of investment required. It should also be noted that whilst these figures are significant, they represents just a fraction compared to the total cost of domestic abuse to the economy estimated by the Home Office is calculated at £74bn in today's prices and are unsurprising given the very high prevalence and high harm of domestic abuse.<sup>27</sup>

**In 2019 Women's Aid assessed that £393 million of investment was needed to effectively resource the specialist domestic abuse sector for women and their children across England.<sup>28</sup> This figure was updated in August 2021 to account for inflation and now stands at £409,307,879.**<sup>29</sup> This figure included the support element of provision, but excludes housing costs for refuge services, which are largely met by housing benefit. Their report also sets out the prerequisites for a sustainable specialist domestic abuse sector, including effective statutory support, national coordination and oversight. This figure covers the other non-housing cost of refuge services including: resettlement support to enable women to move on to a new home from refuge; dedicated support for children and young people staying in the refuge; therapeutic support services, such as formal counselling

<sup>25</sup> MoJ Silver Command data and Refuge. Data provided in Appendix 3.

<sup>26</sup> The Home Office (2019), *The economic and social costs of domestic abuse*, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/918897/horr107.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/918897/horr107.pdf)  
<sup>27</sup> Home Office (July 2021), *Tackling violence against women and girls strategy*, [Tackling violence against women and girls strategy](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/918897/horr107.pdf), [Tackling violence against women and girls strategy](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/918897/horr107.pdf) - GOV.UK ([www.gov.uk](https://www.gov.uk))

<sup>28</sup> Women's Aid. (2020) *Fragile funding landscape: the extent of local authority commissioning in the domestic abuse refuge sector in England 2020*, Bristol: Women's Aid. [Commissioned funding for refuge services in England \(womensaid.org.uk\)](https://www.womensaid.org.uk)

<sup>29</sup> Women's Aid (2021), *Funding specialist support for domestic abuse survivors*, [Funding specialist support for domestic abuse survivors](https://www.womensaid.org.uk) - Womens Aid

and support groups. This figure also includes community-based support (CBS) services, including: outreach; floating support and advocacy (including IDVA) services; dedicated support for children and young people; therapeutic support services, 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).

**Building on the Women's Aid 2019 calculation, in autumn 2020 SafeLives published further research which estimated that £2.2bn of public investment would be required to cover the cost of domestic abuse for the whole family.** This figure covers the support provided to adult victims, children and behavioural change programmes for perpetrators of domestic abuse.<sup>30</sup> The bulk of this spend (£1bn) would be required to support adult victim services with additional investment recommended for an ongoing public health campaign to change public attitudes towards domestic abuse, building on the success and the impact of the Government's #YouAreNotAlone campaigns, as well as ongoing support for helplines and online support.

**Both the submissions put forward by Women's Aid and SafeLives acknowledge the precarious funding position of the specialist by and for sectors in delivering support to victims and survivors of domestic abuse and highlight the benefits of making dedicated funding available to these services to help ensure that they are able to continue delivering their highly specialist support to those victims who face the highest level of barriers accessing mainstream services.** The total level of investment required by specialist by and for services is not fully costed in these calculations.

## What does the Domestic Abuse Commissioner's mapping research tell us about the current provision and funding of domestic abuse services?

### Introduction

The Domestic Abuse Commissioner is conducting a large-scale and comprehensive research project, to map the provision of domestic abuse services in England and Wales. This is a significant step to addressing the postcode lottery in support for domestic abuse victims, their children, and interventions for perpetrators. As well as understanding the availability of services and the types of organisations that provide them, the research explores the financial sustainability and funding landscape.

While recognising that organisations and their services may not always discretely fall under single categories, the research broadly categorises services as:

- **Accommodation-based**, such as refuges and other forms of safe accommodation;
- **Community-based and recovery work**, including IDVA and other caseworker support, floating support and outreach, specialist counselling, and support groups;
- **Open-access services**, including helplines, drop-in centres and online webchat;
- **Behaviour-change interventions** e.g. perpetrator programmes; and,
- **Prevention and awareness**, such as educational work with schools.

This covers a broad range of services including support for other forms of VAWG (e.g. sexual violence services), as many victims who use these services do so in relation experiencing these forms of VAWG as part of domestic abuse. Services specifically targeted

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<sup>30</sup> SafeLives (2020), *A Safe Fund: costing domestic abuse provision for the whole family*, [A Safe Fund: costing domestic abuse provision for the whole family | Safelives](#)

at children and young people who have been affected by domestic abuse, either through their own intimate relationships or their own home / family, are also included within scope.

While the research is ongoing, this submission is supported by early findings from a survey sent out to organisations providing domestic abuse services in England and Wales. Reporting focuses on conclusions at the national level and priority areas covered in this spending review – namely the provision of community-based services and the important role of ‘by and for’ organisations in providing specialist support to marginalised victims.

Over the coming weeks, the Commissioner’s Office will undertake detailed analysis and assurance of responses to the service provider survey. This will include filling gaps where organisations did not respond to the survey in order to provide comprehensive regional comparisons. In parallel, the research will also move onto the victim engagement phase, capturing experiences of accessing domestic abuse services and the extent to which this varies by region.

All data and findings are therefore provisional and subject to completion of the final mapping report in 2022. More detail on the project timeline can be found in Appendix 2.

### Who responded to the survey?

The Commissioner sent the survey to 643 organisations in England and Wales, and received responses from 476 of these organisations, representing a response rate of 74%.

Organisations could opt to provide multiple responses to the survey (one for each service / local authority area) or a single response covering multiple services / local authority areas. All but five organisations opted to provide a single survey response. The remaining five organisations provided 65 responses between them, which means that a total of 536 in-scope service responses were received. As the analysis counts responses individually, some results and findings may be skewed by organisations who provided multiple responses. For the purposes of findings presented in this submission, this approach is considered reasonable as these organisations generally provided one response per local branch / service.

Based on questions on how the organisations defined themselves, we have categorised organisations under one of four mutually exclusive categories:

- **VAWG / DA:** This means that the organisation’s primary focus is either on domestic abuse, another form of VAWG, or VAWG more generally.
- **By and for:** An organisation that is designed and delivered by and for people who are minoritised (including race, disability, sexual orientation, transgender identity, religion or age). Their services are rooted in the communities they serve. A by and for organisation which has a primary focus on domestic abuse or VAWG would be included in this category rather than VAWG / DA.
- **Broader remit:** This means that the organisation has a remit that extends beyond domestic abuse or VAWG but may provide services specifically for domestic abuse victims. For example, multi-crime agencies and housing associations.
- **Public sector:** Where a public sector body (e.g. local authority) provides domestic abuse services in-house. This does not include services commissioned by the public sector.

Table 1 shows a breakdown of responses by these categories. While each survey response has not yet been assured for accuracy, an initial sense-check has been undertaken to remove any organisations that erroneously self-identified as by and for Black and minoritised, LGBT+, Deaf, or disabled victims. These organisations will be re-categorised as part of the Commissioner’s further assurance of survey responses.

**Table 1 Responses by organisation category (n=518)**

Type of org.	Total	%
<b>VAWG / DA</b>	<b>262</b>	<b>50%</b>
Domestic Abuse	202	
Wider / other VAWG focus	60	
<b>By and for</b>	<b>67</b>	<b>13%</b>
Black and minoritised	62	
LGBT+*	1	
Deaf	2	
Disabled	2	
<b>Broader remit</b>	<b>143</b>	<b>27%</b>
<b>Public sector (providing in-house service)</b>	<b>46</b>	<b>9%</b>
<b>Total</b>	<b>518</b>	

\* There are at least eight additional LGBT+ by and for organisations identified through currently unpublished research by Galop and Durham University on behalf of the Domestic Abuse Commissioner’s Office. This research will be incorporated into the final mapping work.

### What types of services do organisations provide?

Organisations were asked to identify whether they provide each of the five broad service categories. Table 2 summarises the breakdown of responses to this question and demonstrates that the majority of organisations who support domestic abuse victims do not provide accommodation. Table 3 breaks this question down into discrete service categories and by organisation categories. The table demonstrates that Violence Against Women and Girls (VAWG)/ domestic abuse organisations are more likely to provide accommodation-based support than by and for organisations.

This means that where policy and statutory funding is focussed on providing safe accommodation, it will not support the widest form of domestic abuse support – which is community-based. By and for organisations are also less likely to benefit from statutory funding directed exclusively towards accommodation-based support.

As set out above, the following tables represent a broad range of types of interventions, and need to be robustly quality assured. Behaviour-change interventions, for example, could include a range of services, from specific perpetrator behaviour change programmes, to services that include a degree of ‘whole family’ working. Equally, ‘prevention and awareness’ could include in-depth early intervention with young people or light-touch awareness raising of services provided through posters or leaflets. More in-depth analysis of survey responses over the coming weeks and months will provide further breakdowns.

**Table 2 Services provided by organisations (n=512)**

Type of service	Number of orgs providing service	% of respondents
Accommodation-Based (e.g. refuges)	197	38%
Community-Based (e.g. IDVAs, groupwork) *	436	85%
Open-Access (e.g. helplines, drop-in centres)	344	67%

Behaviour-Change (e.g. perpetrator programmes)	181	35%
Prevention and awareness (e.g. educational work)	413	81%

\*including recovery work

**Table 3 Organisations by service categories (n=498)**

Organisation category	Community-based (without accom)	Accommodation-based *	Other	Total
VAWG / DA	104 (41%)	125 (50%)	22 (9%)	<b>251</b>
By and for	36 (54%)	24 (36%)	7 (10%)	<b>67</b>
Broader remit	9 (67%)	31 (22%)	14 (10%)	<b>138</b>
Public sector	24 (57%)	11 (26%)	7 (17%)	<b>42</b>
All categories	257 (52%)	191 (38%)	50 (10%)	<b>498</b>

\* 87% of organisations that provided accommodation-based support also provided community-based support

### **Funding for community-based and accommodation-based services**

The survey asked respondents to identify the main source of funding and any other sources of funding in either each of the local authorities where they provided services for domestic abuse victims, or the main (and other) sources of funding across all local authority areas. Options for statutory funding included funding from Local Authorities, Police and Crime Commissioners, Clinical Commissioning Groups / NHS Trusts, Central Government Grants, and the Criminal Justice / Probation services. Options for non-statutory sources of funding included charitable grants, fundraising and income generating activities, and internal reserves. The survey also collated annual income for domestic abuse services in England and Wales. All funding questions were based on year end March 2021.

While further work is needed to assure responses and to improve response rates to funding questions, initial analysis suggests accommodation-based services were 14% more likely to receive their main source of funding from a statutory source, compared to community-based services.

Where services were in receipt of statutory funding as a main source, the majority of organisations identified their local authority as the main funding source. However, accommodation-based services were considerably more likely to be in receipt of local authority funding (as a main source) than community-based services. The main funding sources for community-based services, where statutory, came from a more diverse mix of PCC and local authority sources.

Organisation size (based on income received for domestic abuse services) is a considerable factor in determining whether services are likely to be in receipt of statutory funding. Large organisations (income of £1m+ for domestic abuse services) were around 50% more likely to be in receipt of a statutory main funding source for their community-based services than small organisations (income of less than £250k for domestic abuse services). Findings so far suggest that the discrepancy between organisation size and statutory funding is greater for community-based services than accommodation-based services.

### **The role of by and for organisations**

Initial findings from the service provider survey demonstrate the important and unique role of by and for organisations. Organisations that identified as being by and for black and minoritised victims were three times more likely to say that they provided community-based support tailored to the needs of migrant victims and victims with no recourse to public funds than other types of organisations. The same organisations were also more likely to accept victims with no recourse to public funds into accommodation-based services.

The mapping work has only so far identified only two organisations that provide by and for support for Deaf victims (based in London, Kent and Cambridgeshire), and two organisations that provide by and for support for Disabled victims (both based in London), demonstrating the extent to which there are vast gaps in holistic provision for Deaf and disabled victims and survivors across England and Wales. Previous mapping work by Galop and Durham University, on behalf of the Domestic Abuse Commissioner's Office, identified that there is no funded by and for LGBT+ provision in the South West or North East of England, or in Wales.

Despite the crucial role that by and for organisations play in providing specialist domestic abuse support, initial findings from the mapping work suggest that they do not receive the same levels of statutory support as other types of organisations. While the majority of organisations providing domestic abuse support received some form of statutory funding in the last year, by and for organisations were five times more likely to have not received any statutory funding for their community-based services compared to other types of organisations.

Even where by and for organisations receive statutory funding, research from Imkaan shows that this funding is likely to be very small compared to statutory funding received from other organisations. Imkaan's research showed that a random sample of 10 England-based, non-BME leading VAWG organisations received 39.6% of their funding from local authorities, compared to 10.9% of the funding for BME organisations surveyed.<sup>31</sup>

The survey has collated data on the number of funding sources organisations receive, the percentage of funding they receive from their main source, and the period of time for which this funding is secured. Responses to these questions will be analysed as part of the Domestic Abuse Commissioner's final mapping report and will provide considerable further context to the above findings

## Funding for community-based services

**The Commissioner strongly welcomed the statutory duty placed on tier one local authorities in the Domestic Abuse Act (2021) requiring them to provide accommodation-based services to victims of domestic abuse and their children, alongside the funding commitment of £125 million in the one year Spending Review 2020 for local authorities to deliver this duty.** The Commissioner is concerned however, that this could have significant unintended consequences for the commissioning of community-based services, which do not have the same statutory underpinning. This concern was recognised by the Government, who, during the final stages of the Domestic Abuse Act, included a duty on local areas to report on the impact of the provisions on wider domestic abuse support. The Commissioner recently conducted extensive engagement with 5 local commissioner of domestic abuse services and this concern was very much shared at a local level.

**In lieu of a similar legal duty, the Commissioner calls on the Government to ensure that sufficient funding is allocated in the Spending Review to underpin the delivery of these vital services.** For victims and survivors of domestic abuse accessing support, 70% of them will do so via community-based services, with the vast majority never spending time in refuge accommodation.<sup>32</sup> Community-based based services play a significant role in preventing domestic abuse, as well as managing the far higher costs that would be incurred

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<sup>31</sup> [https://docs.wixstatic.com/ugd/2f475d\\_9cab044d7d25404d85da289b70978237.pdf](https://docs.wixstatic.com/ugd/2f475d_9cab044d7d25404d85da289b70978237.pdf)

<sup>32</sup> Add in reference for Second Reading briefing.

by Government if a survivor moves into refuge accommodation. What is more, community-based services have faced an equally fragile funding landscape as refuge accommodation. Community-based services consistently report caseloads that are considered to be unsafe, and 23% of these services operate without any local authority funding at all.<sup>33</sup>

**To ensure that funding for community-based services is sustainable on a longer-term basis, the Commissioner strongly supports the creation of a new statutory duty on all relevant public authorities (PCCs, CCGs and local authorities).** We urge the Government to consider this new duty within the scope of the forthcoming Victim's Bill. For the purpose of the Commissioner's mapping research, community-based services are defined as the following:

- Floating support, outreach and advocacy roles, including for example, Independent
- Recovery work, including counselling, group work and support groups
- Children and young people services
- Perpetrators programmes

The mapping also considers open access services, including helplines, drop ins and online web chats. Funding allocations for community-based services should also cover the clinical supervision required by staff in these services (as they should in accommodation-based services too). Workloads have not only increased during the Covid-19 pandemic, but in many cases the complexity and level of violence has also increased. Additional pressures of home schooling, having to work from home and a loss of normal coping strategies means there is a greater risk of low morale, stress and anxiety.

**When finalised in Spring 2022, the Domestic Abuse Commissioner's mapping work will help to provide a more accurate sense of the total amount required to fund community-based services.** As outlined above, Women's Aid have estimated that at least £409 million is needed next year to run the specialist domestic abuse services across England, calculating there to be a current shortfall of over £200 million.<sup>34</sup> Of the £409 million, Women's Aid calculated that £228,376,027 is required for community-based services, based on a unit of one per 10,000 population (5,699 units of this support). This figure includes: outreach, floating support and advocacy (including IDVAs) services; dedicated support for children and young people, either where their parent is being supported, or where support is being provided directly to them independently; therapeutic support services, 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).

**For the purpose of this submission, the Commissioner has identified a number of key elements of community-based services with estimated costs outlined below.** Whilst these do not represent the sum total required, taken together, they provide an important foundation for more sustainable funding, particularly for specialist by and for services.

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<sup>33</sup> (SafeLives Practitioner survey 2020/21)

<sup>34</sup> [Women's Aid launches national campaign Deserve To Be Heard to highlight impact of domestic abuse on mental health of women and their children - Womens Aid](#)

## Recommendations

### Dedicated funding for specialist by and for services

#### Key issues

**Specialist by and for services provide highly tailored support for groups of people with protected characteristics and those who experience the highest levels of exclusion from mainstream services.** This includes LGBT+, Deaf, disabled and Black and minoritized victims and survivors of domestic abuse as well as migrant women. The term 'by and for' is used to refer specifically to organisations that are designed and delivered by and for people who are minoritized. These services will be rooted in the communities that they serve, and provide wrap-around holistic recovery and support that addresses a victim's full range of needs.

**It is well established that victims and survivors with protected characteristics, are best served by specialist "by and for" services.** As the Government's VAWG Commissioning Framework highlights, "investment in BME-led specialist organisations has been shown to deliver significant financial savings as well as a range of social benefits and outcomes for service users."<sup>35</sup> These services often provide additional support such as welfare advice, language interpreters, specialist counselling, and will work with victims and survivors for much longer periods of time. For example, Stay Safe East, a specialist by and for service working with disabled victims of domestic abuse, works with survivors on average at least four times longer, and usually eight times longer than standard IDVA services. Evaluation of services demonstrates that additional time is necessary in order to support disabled victims to cope and recover.

**These specialist holistic services provided therefore incur higher running costs, and as a result are disproportionately disadvantaged by the local commissioning and funding process.** Too often local commissioners lack the understanding and capacity to commission multiple specialist services required to meet the needs of a diverse population, with many favouring fewer, more generic providers who deliver larger, cheaper contracts, but are unable to deliver the same level of tailored support. When there is a lack of a crucial mass of service users within a defined geographical area, the commissioning structure often discourages specialist services from applying. The commissioning of one single service often means that specialist by and for services are ineligible to apply. A recent study from the grant maker Comic Relief also reported several key blockages to accessing funding. These included partnership and power dynamics at the local level, the cost-focused competitive tendering processes and challenges in communicating value, an overemphasis on project-and innovation-focused funding and a bias against smaller/less established organisations because of complex application processes and lack of support to complete these.<sup>36</sup>

**Women's Aid's report, *Fragile funding landscape*, found that specialist by and for services are far less likely to receive statutory funding than other providers of support.**<sup>37</sup> The report found that non-commissioned services ran 57.5% of all refuge spaces in specialist 'by and for' services, compared to the overall 18.5% of all non-commissioned refuge spaces, highlighting the particular challenges specialist by and for services

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<sup>35</sup> Home Office (2016), [VAWG commissioning toolkit \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

<sup>36</sup> University of Suffolk (2020), *Mapping the VAWG funding ecosystem in England and Wales* <https://www.uos.ac.uk/sites/www.uos.ac.uk/files/Mapping%20VAWG%20funding%20ecosystemFINAL.pdf>

<sup>37</sup> Women's Aid. (2021) *Fragile funding landscape: the extent of local authority commissioning in the domestic abuse refuge sector in England 2020*, Bristol: Women's Aid. <https://www.womensaid.org.uk/wp-content/uploads/2021/02/Fragile-funding-landscape-the-extent-of-local-authority-commissioning-in-the-domestic-abuse-refuge-sector-in-England-2020.pdf>

encounter.<sup>38</sup> This is further supported by initial findings from the Domestic Abuse Commissioner's mapping research, which found that community-based services provided by specialist by and for organisations were five times more likely to not be in receipt of any statutory funding compared to other types of organisations.

**Difficulties accessing statutory funding through the local commissioning process have had a significant impact on the financial position of these sectors and the support they are able to deliver to survivors.** Women's Aid have reported that there are only 36 refuge services across England which provide specialist support for these groups of victims and survivors.<sup>39</sup> The majority of these services are based in London. For example, across England there are currently only five specialist domestic abuse services designed to meet the needs of LGBT+ survivors of domestic abuse.<sup>40</sup> Currently unpublished research undertaken by Galop and Durham University for the Domestic Abuse Commissioner shows that there are only seven LGBT+ by and for organisations who are funded to provide domestic abuse services, based in London, Manchester and Birmingham. For Deaf and disabled survivors, who are twice as likely to experience domestic abuse than non-disabled women,<sup>41</sup> there are only four by and for organisations providing domestic abuse support, based in London (Deaf and disabled), Kent (Deaf only), and Cambridgeshire (Deaf only). Forthcoming independent research on the impact of Covid-19, found that 75% of Imkaan members, who provide specialist by and for services for Black and minoritized women entered the pandemic with less than three months reserves. A 2016 report from Imkaan reported that in the space of a year, 50% of Black and minoritised women's specialist refuges were forced to close or were taken over by a larger provider due to lack of funding over the last decade, while others continue to operate without any local government support.<sup>42</sup> An FOI request to all London councils found that refuges led 'by and for' Black and minoritised women lost around half of their annual council funding between 2009 and 2016.<sup>43</sup>

**Whilst the problems of chronic underfunding are common across specialist by and for sectors, there are some groups of victims of survivors for whom access to this tailored support is almost impossible because of the limited number of services across the country. This is particularly the case for Deaf and disabled survivors and LGBT+ survivors.** For example, the Domestic Abuse Commissioner's mapping work has only so far identified three organisations that provide by and for support for Deaf victims, and three organisations that provide by and for support for Disabled victims, demonstrating the extent to which there are vast gaps in holistic provision across England and Wales. There is an urgent need to replicate this service nationally, working with local partners, to give Deaf victims access to the right support in their own language.

**These sectors not only require additional investment to increase the level of provision within existing services, but also funding to help expand their own capacity across the country and develop specialist capacity within other organisations to ensure that**

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<sup>38</sup>Women's Aid. (2021) *Fragile funding landscape: the extent of local authority commissioning in the domestic abuse refuge sector in England 2020*, Bristol: Women's Aid. <https://www.womensaid.org.uk/wp-content/uploads/2021/02/Fragile-funding-landscape-the-extent-of-local-authority-commissioning-in-the-domestic-abuse-refuge-sector-in-England-2020.pdf>

<sup>39</sup> Women's Aid (2021), *The Domestic Abuse Report*, <https://www.womensaid.org.uk/wp-content/uploads/2021/01/The-Domestic-Abuse-Report-2021-The-Annual-Audit.pdf>

<sup>40</sup> Women's Aid (2021), *The Domestic Abuse Report*, <https://www.womensaid.org.uk/wp-content/uploads/2021/01/The-Domestic-Abuse-Report-2021-The-Annual-Audit.pdf>

<sup>41</sup> End Violence Against Women and Girls (2021), *Violence Against Women and Girls Snapshot Report 2020/21*, <https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/Violence-Against-Women-and-Girls-Snapshot-Report-FINAL-1.pdf>

<sup>42</sup> Imkaan (2016). 'Capital Losses'. London: Imkaan

<sup>43</sup> <https://www.theguardian.com/society/2018/mar/23/council-funding-womens-refuges-cut-since-2010-england-wales-scotland>

**there is a national network of support that can be accessed by survivors, wherever they live.** In acknowledgment of these challenges, the Ministry of Justice are currently delivering £1,713,000 of funding via Comic Relief to specialist by and for organisations in England and Wales that support survivors / victims of domestic abuse and sexual violence.<sup>44</sup> This fund is designed to invest in support costs, including hardware and software, which improve digital and remote capacity, provide continuity in support, and enhance future sustainability. Alongside funding, successful applicants will receive digital and technical coaching and expertise from a support partner. The Commissioner very much welcomes this pot, and the funding arrangement, which bypasses local commissioning structures, but is concerned that it is only being made available to successful applicants at the end of September 2021 and for projects that must finish by the end of February 2022. The short-term nature of the funding means, and the lack of accompanying investment for direct service provision, that these vital skills are unlikely to be fully embedded within services representing a poorer return on investment for the Government.

### Solution

- **The Commissioner recommends that the Government creates a single dedicated cross-government funding stream for specialist by and for services.** The Commissioner specifically recommends that this dedicated pot be made available to specialist by and for organisations supporting victims and survivors with protected characteristics (including Black and minoritised, LGBT+ and Deaf and disabled survivors) as well as victims and survivors who have no recourse to public funds. This will be essential in helping to meet the higher running costs incurred by these services which provide the most suitable and holistic support to survivors, ultimately helping to end domestic abuse for good, and enabling them to successfully rebuild their lives.
- **The Commissioner strongly recommends that this pot should be administered directly from national government straight to frontline services to ensure that they are not disadvantaged by local commissioning structures which favour more generic providers.** We would recommend that the funding pot is administered by the Ministry of Justice based on its extensive experience of commissioning victims support services and in particular its experience of administering the Rape and Sexual Abuse Support Fund directly to 79 rape support centres across England and Wales, by passing local commissioning structures to ensure country-wide coverage of these vital services.<sup>45</sup> The Ministry of Justice should coordinate this work with relevant central government departments including the Home Office, the Department for Levelling Up, Housing and Communities and the Department for Health and Social Care. A key benefit of national government directly commissioning services itself is that it would be able to collect evidence from organisations on the outcomes and performance of services, both helping to improve the efficiency of future commissioning processes and ensuring evidence-based policy making within departments regarding the key issues facing these victims and survivors. Learnings from the dedicated funding stream could be used to help support the work of the VAWG What Works Centre. Plans for this Centre were outlined earlier in the year, in the Home Office's Violence Against Women and Girls Strategy.
- **The Commissioner strongly recommends that the funding stream is utilised as an opportunity to allocate longer term funding to organisations, with funding contracts of at least three years being awarded.** This will be essential in helping to ensure the sustainability of services as well as providing government with a stronger

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<sup>44</sup> [Ministry of Justice Specialist Fund | Comic Relief](#)

<sup>45</sup> [Organisations awarded funding from the Rape Support Fund 2014–16 \(publishing.service.gov.uk\)](#)

guarantee on return on investment. Too often, funding is allocated to organisations to help build capacity and an subsequent inability to secure future funds, means that key learnings and skills are lost.

- **The Commissioner recommends that this funding stream should be used to help organisations to deliver front line support within existing services as well as helping organisations build capacity to expand the infrastructure needed across the country to deliver services to victims and survivors wherever they live.** This could include providing specialist training to other frontline domestic abuse services. The Commissioner would also envisage that in order to achieve national coverage of specialist support that a proportion of this funding stream is dedicated to innovative digital solutions including remote caseworkers and online and telephone support services, which can be accessed wherever a victim or survivor is based in the country.

### Projected costs

- **The Commissioner has worked closely with specialist by and for services to calculate the level of investment required to meet current levels of demand and expand capacity across the country to meet the needs of victims and survivors who face the highest levels of exclusion in England and Wales**
- Based on calculations from the specialist by and for sectors<sup>46</sup> we have estimated the following costs for delivering this fund over a three-year period.

	Annual	3 years
Disabled survivors	£30,209,187	£90,627,562
Deaf survivors	£1,325,000	£3,975,000
LGBT+ survivors	£1,000,000	£3,000,000
Black and minoritized survivors	£55,099,306	£165,297,918
<b>Total by and for pot</b>	<b>£87,633,493</b>	<b>£262,900,480</b>

- **Disabled survivors:** The Commissioner worked with Stay Safe East, who work with disabled survivors of domestic abuse in 16 out of the 33 London boroughs and some areas in Essex, to calculate these costs.<sup>47</sup> This figure covers the running costs for the services in those existing areas as well as the cost of scaling up similar support across the rest of England and Wales. Costs include: the provision of Disability and Independent Domestic Violence Advocates (IDDVA) who each work with around 25-30 clients per year, depending on their experience; welfare benefits specialists working with 50 clients per year; client costs, including British Sign Language and spoken language; staff welfare; premises costs; and peer support for victims and survivors.

<sup>46</sup> The Domestic Abuse Commissioner had worked closely with Galop, Imkaan, Sign Health and Stay Safe East to estimate these costs based on units costs taken from their own and member services.

<sup>47</sup> It should be noted that the figures used to estimate the national cost of delivery are based on unit costs from London and the South East. We therefore expect both staffing costs and premises costs (which make up a significant proportion of the total figure) to represent an overestimate as the cost of delivery will be lower in other areas of England and Wales.

- Black and minoritized survivors:** These figures are based on a wider representation that is being made to the HMT Treasury from Imkaan, who are the membership body for organisations providing specialist by and for provision for Black and minoritized survivors of domestic abuse and other forms of violence against women and girls. They have estimated that the total cost of delivering specialist support services in the Black and minoritized women and girls sector is £97,085,661 per year. This cost accounts for an inflationary increase of 3.20% and funding shortfall of 39%.<sup>48</sup> The figure presented by the Domestic Abuse Commissioner does not include some of the additional costs included in this figure, including refuge provision, which is calculated at £13,253,569. The figure presented in this representation includes: advocacy and support for victims and survivors (e.g. casework), clinical supervision for staff, counselling for victims and survivors, service user direct costs (this is calculated at £30 per week for survivors facing destitution), management costs, staffing capacity; technology, phones, computing and digitalisation costs.
- Deaf survivors:** The Commissioner worked with Sign Health, who are a specialist by and for service for Deaf survivors, to calculate the cost of a national service, developed out of their Greater London and South East base, which is already funded through various pots including funding from London Councils. The springboard areas of expansion will be delivered out from Manchester, Birmingham, Leeds and Bristol. They have calculated that they require £5.2m to develop a national specialist Domestic Abuse Service for Deaf people over a four-year period. The figure presented in this representation (£3,975,000) are the costs incurred over the three-year spending review. These costs cover: 11 new posts for Deaf people in specialist regional IDVAs and Young People Violence Advisors (YPVAs) to provide support to families, women, men and girls; education and awareness programmes about domestic abuse across Deaf youth groups, Deaf Social Clubs and Charities; British Sign Language videos and other online resources to provide educational and support for survivors and professionals; small group and individual therapeutic interventions to support emotional wellbeing; an educational programme targeting Deaf children and young people; building capacity of Deaf communities by showing them how to use apps and technology, e.g. how to identify and get timely support for domestic abuse.
- LGBT+ survivors:** The Commissioner worked with Galop, a specialist domestic abuse charity for LGBT+ survivors to estimate this cost. Research from Stonewall and YouGov in 2018 estimated that 11% of LGBT+ people experienced domestic abuse in the last year, which would be approx. 290,400 people per year.<sup>49</sup> Galop estimate that approximately an additional £1,000,000 of funding is required each year for three years for the development of specialist models to address the needs of the disperse LGBT+ population, and to develop new services (remotely, regionally, or in new service areas like mental health support). This includes additional IDVAs, working with 60 clients per year, a small national service for victims and survivors and remote advocates (estimated at £400,000 per year).

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<sup>48</sup> Sheil, F. 2020. Calculating the Cost of VAWG and COVID 19 on Specialist Services for the Black and Minoritised Women and Girls Sector in England, Wales and Scotland. London. Imkaan.

<sup>49</sup> Stonewall (2018), *LGBT in Britain: Homes and Communities*, [lgbt\\_in\\_britain\\_home\\_and\\_communities.pdf \(stonewall.org.uk\)](https://www.stonewall.org.uk/lgbt-in-britain-home-and-communities.pdf)

## Family courts

### Key issues

**The Ministry of Justice's Harm Panel report found serious structural issues in the way that domestic abuse allegations were handled, the way that risk and potential harm to children was assessed, and the way that survivors themselves were re-traumatised by the court process.**<sup>50</sup> These issues are borne out in the correspondence the Domestic Abuse Commissioner's office receives from survivors, with the family court being the single most common problem that survivors write to us about. The Harm Panel Report details how survivors and their children face a culture of disbelief, with a lack of understanding of domestic abuse by the courts,<sup>51</sup> as well as a pro-contact culture, with domestic abuse allegations not sufficiently taken into account.<sup>52</sup> Family proceedings were found to be retraumatising, due to lack of special measures and specialist court support, and poor implementation of Practice Direction 12J, exacerbated by a lack of resources leading to long delays and inconsistency in judges hearing cases.<sup>53</sup> Additional barriers were found to exist for survivors sharing protected characteristics and/or migrant status.<sup>54</sup>

**These problems were found to be further worsened by lack of access to legal aid.**

While survivors of domestic abuse are entitled to means-tested legal aid, the eligibility threshold is set much too high, meaning many survivors can neither access legal aid nor afford their own lawyer. Far too many survivors alleging domestic abuse as a risk factor in child proceedings have to prove this on the balance of probabilities in an adversarial system with no legal representation at all. This, together with the other issues set out above, clearly impacts on the safety of children concerned.

**The structural failings of the family courts as set out above mean that risk to children from alleged perpetrators of domestic abuse is not being properly assessed, leading potentially to unsafe court ordered contact arrangements for many children.** The data on this is currently very poor, but will be improved by the establishment of a family courts monitoring mechanism within the Domestic Abuse Commissioner's office (as set out further below). The negative impacts on children from domestic abuse are well-known (and include negative impacts on children's development and future mental and physical health and associated costs arising from this).<sup>55</sup> Government has recognised this impact, with children now explicitly being recognised as victims in the new Domestic Abuse Act. In addition, the retraumatising nature of proceedings for survivors likely also leads to poorer mental health outcomes for such survivors following family court proceedings. Investing in the solutions set out below would therefore: (1) reduce the number of unsafe contact arrangements ordered by the court; help to improve child safety and wellbeing at a much earlier stage and thereby potentially reduce future costs in terms of the physical and mental health interventions that are needed by children who experience domestic abuse; and (2) reduce the retraumatising nature of proceedings, thereby potentially improving the mental health of survivors (and reducing costs associated with mental health interventions needed following traumatic proceedings).

### Solutions

The Harm Panel report was an important milestone towards much needed change in the family courts. Progress has been made on implementing its recommendations but this must

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<sup>50</sup> Ministry of Justice (June 2020), [Assessing Risk of Harm to Children and Parents in Private Law Children Cases](#),

<sup>51</sup> Ministry of Justice (June 2020), [Assessing Risk of Harm to Children and Parents in Private Law Children Cases](#), 49.

<sup>52</sup> [Ibid.](#), 4

<sup>53</sup> Ministry of Justice (June 2020), [Assessing Risk of Harm to Children and Parents in Private Law Children Cases](#),

<sup>54</sup> Ministry of Justice (June 2020), [Assessing Risk of Harm to Children and Parents in Private Law Children Cases](#), 45-47.

<sup>55</sup> See for example, NSPCC, [Child abuse and neglect in the UK today](#), which includes specific findings on domestic abuse.

continue at pace. We suggest four key recommendations essential to achieving this, that that should be addressed through the Spending Review.

#### *Establishment of a monitoring mechanism:*

- The Harm Panel recommended the establishment of national monitoring and reporting mechanism within the Domestic Abuse Commissioner's office (in partnership with the Victims' Commissioner) to report regularly on the family courts' performance on how cases involving allegations of domestic abuse are treated in private law children's proceedings. The establishment of this mechanism is key to securing the much needed improvements for survivors and children in the family courts, thereby improving children's safety and survivors' experiences, and my office is working with all relevant agencies to establish this. The government must make sufficient funding this mechanism in the upcoming spending review.

#### **Projected costs**

- A minimum of £150,000 is needed for an initial pilot project which will: scope available data; pilot a mixed methods approach for monitoring the Family Court's response to domestic abuse in private law children's proceedings across 3 areas; and design a framework for ongoing monitoring. This initial funding will cover the initial pilot project only (which we anticipate will last one year). Further funding will be needed within the Spending Review period for the mechanism to operate on an ongoing basis following the initial one-year phase.

#### *Training for judges and court staff in the family court:*

- More in-depth, extensive and frequent training on domestic abuse, including the dynamics of coercive control and post-separation abuse, is needed both for the judiciary and lawyers involved in the family justice system. Sufficient funding should be made available to the Judicial College to run in-depth, extensive cultural change training on domestic abuse, as recommended by the Harm Panel. We consider that sufficient funding should also be made available by government for domestic abuse specific training for court staff, who are important in helping facilitate special measures for survivors. This specialist training will lead to improvements in the understanding of domestic abuse among judges and court staff. This in turn will help to improve how the courts assess harm to children from alleged perpetrators of domestic abuse,<sup>56</sup> reduce the likelihood of unsafe contact arrangements, improving the safety of children and therefore leading to fewer future costs associated with mental and physical health interventions needed by child survivors of domestic abuse. The training of court staff will help improve how survivors are treated, leading to a less re-traumatising experience and therefore fewer onwards costs associated with mental health interventions following proceedings.

#### **Projected costs**

- Safe Lives estimates that £1.5 million per annum is needed to provide culture change training to the judiciary.<sup>56</sup> For the full three years of the Spending Review, £4.5m would therefore be required for this (minus any savings from combining the full culture change programme with the existing judicial training on domestic abuse). We of course understand that the Judicial College manages the training of judges, including commissioning external providers, and are not seeking to suggest any specific provider at this stage (which would in any case be a matter for the Judicial College to decide). Rather, the Safe Lives figures are provided to give a sense of the funding required to be provided to the Judicial College to allow for the in-depth

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<sup>56</sup> Improvement in judges' understanding will help improve their assessment of the evidence before them, while improvement in the understanding of court staff will help survivors feel safer in the court environment, and therefore better able to give best evidence.

culture change training we think is required. Further funding will be needed for court staff.

#### *Specialist court support:*

- Adequate specialist court support (specialist IDVAs or other specialist support advocates, including those from by and for services) for survivors is essential. The importance of this support is demonstrated in the report the Domestic Abuse Commissioner commissioned from Safe Lives and has been one of the strongest points that has been made in the eight roundtables our office has held (with lawyers, academics, children's sector organisations, domestic abuse support services and survivors) as part of the establishment of a monitoring mechanism. However, our report found that currently almost 90 per cent of domestic abuse victims don't get any specialist support through the family courts. The government must provide long-term specific funding for such support.

#### **Projected costs**

- Further funding is required for in-depth research to fully understand the levels of need in the family justice system for specialist domestic abuse support. Safe Lives estimates an investment of around £35,000 to cover a literature review, surveys with survivors supported and not supported, with frontline IDVAs and with legal professionals, plus deep dive into datasets, establishment of outcomes measurement and costings work.
- To give very approximate figures on the basis of publicly available information currently, Safe Lives estimates that £50,000 covers the annual cost of a standard IDVA, which usually works with a maximum of 100 cases per year. Where an IDVA is helping a client that needs court support, on average, these cases last 50% longer, meaning an annual case load of only 70. In the year to December 2020, 55,669 private law children's cases were started.<sup>57</sup> Estimates suggest that between 40% (ie. 22,267.6) and 60% (i.e. 33,401.4) of private law children cases involve allegations of domestic abuse.<sup>58</sup> To cover 22,267.6 cases would require 318 IDVAs costing £50,000 each (total of £15.9 million per annum); to cover 33,401.1 would require 477 IDVAs costing £50,000 each (total of £23.8 million per annum). As set out above, specialist court support would not necessarily need to be provided by an IDVA but could also be provided by other frontline domestic abuse workers (including those from specialist by and for services) that have been appropriately trained to ensure they have the skills and knowledge required in relation to family courts.

#### *Legal aid:*

- The Commissioner strongly supported the need for non-means tested legal aid for survivors of domestic abuse in private family law proceedings. The lack of legal aid in Private Family Law Proceedings is a large contributor to the current backlog of cases within the Family Court. The Family Court process is complex and designed for legal professionals, however individuals without legal qualifications are finding themselves having to navigate proceedings without support. Investment in legal aid for Private Family Law Proceedings involving domestic abuse would help reduce the length of disposals for these cases and help the family justice system run more efficiently.
- Whilst individuals involved in public family law disputes fall within the scope of legal aid, the same level of provision is not granted in private family law proceedings, with only a limited number of individuals being eligible to access legally aided representation.
- The means test for legal aid is very stringent, with research by the Law Society showing that individuals on incomes already 10% - 30% below the minimum income were being excluded from legal aid.<sup>59</sup>

- As litigants in person, individuals can cause delays in proceedings due to misapplications of practice directions, lack of information as to how to make appropriate applications and lack of knowledge as to how to conduct proceedings. This means that basic applications can take much longer due to being incorrectly submitted, or individuals miss deadlines to being unaware of how to comply with Court directions.
- In addition to this, hearings involving litigants in person tend to take longer than those in which the parties have legal representation. This is due to the fact that the Judge, (or even opposing counsel where one party is represented), has to spend time during the proceedings to explain what is happening in proceedings and any decisions made by the court. Consequently, even simple directions hearings can take much longer than if they were being conducted by counsel. The protracted nature of these proceedings can contribute to the case backlog, with the average length of proceedings increasing from 22.3 weeks in 2016 to 32 weeks in 2020.<sup>60</sup>

### Projected costs

- It is estimated that providing legal aid to all survivors of domestic abuse in private family law proceedings would cost around £76m - 114m per year. This is £43m - £81m more than is currently being spent. The calculations for this are provided in Appendix 1 below.

### Dedicated funding to support survivors with no recourse to public funds

#### Key issues

**An upcoming report from the Domestic Abuse Commissioner entitled *Safety Before Status* examines the barriers and pathways to support for migrant victims and survivors of domestic abuse. The report identifies a gap in support available for victims with No Recourse to Public Funds (NRPF) who are prevented from accessing housing benefit which is used to fund most refuge bed spaces.** Victims on spousal visas are entitled to support via the Destitution Domestic Violence Concession (DDVC). However, two thirds (67%) of the women with NRPF supported by Women's Aid Federation of England's No Woman Turned Away Project in 2016 weren't eligible for support via the DDVC.<sup>57</sup> This often leaves people in this situation facing the prospect of destitution and homelessness or staying with their abuser. homelessness or staying with their abuser. **Part 4 of the Domestic Abuse Act brought forward welcome changes to the provision of accommodation-based support such as refuge via a duty on all local authorities to commission support within safe accommodation for victims and survivors of domestic abuse. However, with most funding models for refuge and other safe accommodation are designed to provide support to victims who can access housing benefit.** Only 4.0% of all vacancies posted on Routes to Support – the secure database where bedspaces for victims fleeing domestic abuse are advertised - in 2019-20 could consider women who had no recourse to public funds.<sup>25</sup>

**Many victims and survivors of domestic abuse with insecure status have complex immigration cases, meaning additional resource is also often needed.** Insecure status is often used by the perpetrator as a tool of coercive control – known as immigration abuse - for example by controlling, removing or destroying documents and misinforming the victim about their status and entitlements. This means that many victims require legal advice over several months in order to regularise their status.

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<sup>57</sup> Women's Aid, [Nowhere to Turn: Findings from the First Year of the No Woman Turned Away Project](#). Bristol: Women's Aid Federation England.

## The solution

- In *Safety Before Status*, due to be published on 18<sup>th</sup> October 2021, the Domestic Abuse Commissioner calls for the Home Office to create a clear and universal pathway of support to victims and survivors with NRPF, to be established and sustained in the long-term following the conclusion of the Migrant Victims Pilot in Summer 2022. In the short term, while this sustainable pathway is established, the Commissioner is calling for funding to be made available at a local authority level so that victims and survivors of domestic abuse with NRPF across every locality can access safe accommodation. This funding pot would enable victims to pay for rent within safe accommodation, as they would if they had access to the DDVC, and would also cover a stipend for each victim/survivor.
- In addition to this, we would want to see dedicated funding allocated to cover legal advice so that victims and survivors can be supported to regularise their status through the national cross-departmental fund for specialist by and for services.

## Projected costs

- According to the Home Office, 262, the average DDVC monthly benefit claim for housing and subsistence is estimated at £857.68,<sup>58</sup> which comes to £2,573.04 for three months. Southall Black Sisters estimates that approximately 2,420 victims and survivors of domestic abuse with NRPF each year not currently eligible for support via the DDVC are in need of support.<sup>66</sup> Covering housing benefit and stipend for a 3-month period to the additional 2,420 victims that are unable to access support via the DDVC would therefore lead to an estimated additional national cost of just over £6.2 million a year, and £18.7m over three years.

## National roll out of a whole-health approach

### Key issues

The Pathfinder project, which was jointly funded by the Department for Media, Culture and Sport and the Department for Health and Social Care, highlights the importance of dedicated expertise within healthcare settings, including the integration of the IRISi programme, which situates specialist support and advocacy training within GPs services, and health-based IDVAs and provides an excellent example of how to lay the foundations of a system-wide, sustainable response to domestic abuse within health systems. We recommend that this approach should be rolled out nationally. The project, led by Standing Together in partnership with four expert partners Against Violence and Abuse (AVA), Imkaan, IRISi and SafeLives ran from 2017-2020, and reached survivors who may not have been identified or supported otherwise.<sup>59</sup> A key aim of the project was to model a whole health approach within a community-based health settings, acute hospital trusts and mental health trusts.

The project found that co-location **is not enough**. The Pathfinder evaluation found that that domestic violence and abuse coordination is both a central intervention function and a central implementation function. Where Health Pathfinder was most impactful, co-located services worked closely with a coordinator or champion with a specific remit to drive action on domestic violence and abuse

**Despite the clear success of the programme, we are concerned that the Department for Health ceased funding in March 2020, arguably at a time when it was needed most.**

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58 Oliver, R., Alexander, B., Roe, R., Wlasny, N., (2019), [The Economic and Social Costs of Domestic Abuse](#). London: Home Office.

59 The Pathfinder Project (2020), *Pathfinder Key Findings*, Report [https://static1.squarespace.com/static/5ee0be2588f1e349401c832c/t/5ef35fc7d4c474437a774783/1593008073853/Pathfinder+Key+Findings+Report\\_Final.pdf](https://static1.squarespace.com/static/5ee0be2588f1e349401c832c/t/5ef35fc7d4c474437a774783/1593008073853/Pathfinder+Key+Findings+Report_Final.pdf)

Approximately 2,738 health professionals have had domestic abuse training since the start of the Pathfinder project.<sup>60</sup> A total of 633 survivors were referred to a domestic abuse support service from a health care setting and went on to engage with this service. 91% of survivors reported that they felt safer as a result of the Pathfinder project. Older victims and victims from Black or ethnic minority backgrounds were more likely to be identified and supported as a result of the Pathfinder programme than through other community-based services.

### The solution

- **The Commissioner recommends that the Government establish a network of Whole Health Coordinators across England to facilitate the implementation of whole health best practice for local areas.** The toolkit and main outputs are well developed to promote further outputs. Coordinators will support local partners to embed and set up systems to ensure a safe, effective and sustainable response across the NHS Trust / CCG. This would upskill health professionals and healthcare organisations on domestic abuse and ensure policies, procedures and practice reflect best practice.

### Projected costs

- Investing in an effective domestic abuse response within healthcare settings makes good business sense. The Crime Survey for England and Wales suggests that nearly 500,000 survivors of domestic abuse use health services every year.<sup>61</sup>
- The Home Office estimates the annual cost of domestic abuse to the NHS is £2.3bn while its total cost to society is £74 billion.<sup>62</sup> Yet SafeLives estimates the annual potential cost savings of Health Based IDVA provision to be £2,050 per survivor.<sup>63</sup> And for every £1 spent on MARACs and IDVAs, at least £2.90 of public money can be saved annually on direct costs to agencies such as public health services.<sup>64</sup>
- Standing Together have calculated that the total cost of rolling out the pathfinder model to 8 new sites over three years would be £2,398,000.

### [Rebuilding your life grant, a local emergency fund to enable victims and survivors to rebuild their lives after fleeing domestic abuse or leaving a refuge](#)

### Key issue

**The cost of leaving an abusive perpetrator can be significant, including costs for transport, rental deposits, replacement of essential items that had to be left behind in a crisis, and other emergency expenditure at short notice.** A lack of financial resources puts women at greater risk of domestic abuse and can leave women with no choice but to stay with the perpetrator: evidence from Professor Sylvia Walby suggests that women who cannot find £100 at short notice are 3.5 times more likely to experience domestic abuse.<sup>65</sup> While there are some financial support available from charities and local authorities, funding is often accessed through highly localised services, with conditions or limitations that prevent all victim/survivors from accessing financial support.

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60 The Pathfinder Project (2020), *Pathfinder Key Findings*.

Report [https://static1.squarespace.com/static/5ee0be2588f1e349401c832c/t/5ef35fc7d4c474437a774783/1593008073853/Pathfinder+Key+Findings+Report\\_Final.pdf](https://static1.squarespace.com/static/5ee0be2588f1e349401c832c/t/5ef35fc7d4c474437a774783/1593008073853/Pathfinder+Key+Findings+Report_Final.pdf)

61 Office for National Statistics (ONS), Domestic abuse: findings from the Crime Survey for England and Wales 2018

62 Home Office, The economic and social costs of domestic abuse – Rhys Oliver, Barnaby Alexander, Stephen Roe and Miriam Wlasny (2019)

63 SafeLives (2016), *A Cry for Health Report: A Cry for Health | Safelives*

64 SafeLives (2016), *A Cry for Health Report: A Cry for Health | Safelives*

65 Walby, S. Home Office Research, Development and Statistics Directorate, March 2004

## The solution

- **We support calls for the establishment of a dedicated fund to enable victims and survivors to rebuild their lives by purchasing emergency items lost as a result of fleeing domestic abuse.** This fund, often referred to as the ‘White Goods fund’ would extend beyond white goods and should include support for a range of financial costs, including to pay off debts incurred as a result of economic abuse and to replace immigration documents lost as a result of immigration abuse.<sup>66</sup> We would recommend that this pot be accessible to all survivors of domestic abuse, including those with No Recourse to Public Funds, a group who often face the greatest financial and practical barriers to accessing support.
- **We would recommend that this funding pot incorporates learning from the flexible funding model piloted in Cambridgeshire and London in 2019-2021 by the Domestic Abuse Housing Alliance as part of the Whole Housing Approach to domestic abuse.**<sup>67</sup> The flexible funding model is a dedicated funding pot that supports victims and survivors to achieve or maintain safe and secure housing. The fund is used to cover costs that are not covered by other sources of funding or where applications to other sources have been turned down. There is no set list of what will be funded and victim/survivors are encouraged to ask for what will make the most difference to their lives: costs covered by the pilots include educational costs, rental assistance, home essentials, moving costs and legal costs. The average payment in both pilot areas was between £500 and £600. Flexible funding is easy to access and requires no evidence of abuse, which reduces the stress that victim/survivors experience and helps ensure that support is available when it is needed.
- **Evidence suggests that early and rapid intervention can improve housing stability which can prevent victims from facing homelessness.** A longitudinal evaluation of flexible funding in Washington DC found that 94% of victim/survivors who accessed this fund were housed six months after receiving funding.<sup>68</sup> Over two years between April 2019-March 2021, Flexible Funding pilots in London (£36,782.56) and Cambridgeshire (£65,499) provided a total of £102,231.56 to victims and survivors of domestic abuse in need of emergency financial assistance.

## Projected costs

- **Based on proportions used for local authority funding allocations for Part 4 of the Domestic Abuse Act, we would estimate that a national fund could be developed to a total cost of at least £3.6m a year for England – to a total of £10.7m for 3 years.** This calculation does not include administrative costs of rolling out and coordinating the delivery of this fund. Additional calculations are also needed to scale the fund up across Wales.
- Assistance for rent and rent deposits made up 29% of the Cambridgeshire fund allocation in April 2019-20 and 7% of the fund was spent on rental assistant/deposits. National fund calculations to not account for the higher cost of rent in Cambridgeshire compared to the national average.

Calculations based on Cambridgeshire:

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<sup>66</sup> A form of coercive and controlling behaviour whereby perpetrators use a victim's insecure immigration status as a tool for control. This can include threatening the victim with enforcement action if they come report the abuse, and controlling, withholding or destroying a victim's immigration documents.

<sup>67</sup> Domestic Abuse Housing Alliance (2021), [Whole Housing Approach](#): Year 2 Report April 2019 to March 2021. London: Domestic Abuse Housing Alliance.

<sup>68</sup> Sullivan, C., Bomsta, H. and Hacskaylo, M. (2016) Flexible Funding as a Promising Strategy to Prevent Homelessness for Survivors of Intimate Partner Violence. *Journal of Interpersonal Violence*, 34(14), 3017-3033. doi: 10.1177/0886260516664318.

	Cambridgeshire allocation	National allocation / suggested allocation	%age of national budget (England)
Part 4 allocations <sup>69</sup>	£1,140,318	£125,000,000	0.9122544%
Flexible funding pilot	£32,749.50*	£3,589,952.50	0.9122544%

\*This figure is based on an average over two years. In April 2019-March 2020, £40,749 was allocated to survivors of domestic abuse (not including set up costs), and in April 2020-March 2021 £24,750 was allocated to survivors.

## Specialist mental health support

### The problem

**Mental health problems are a common consequence for both adult and child survivors of domestic abuse, and we are concerned about the lack of availability of mental health support for survivors and their children.** Research has shown that women who have experienced domestic abuse are three times more likely to be diagnosed with a mental health problem.<sup>70</sup>

**During the Covid-19 pandemic, there has been a significant increase in the number of people reaching out to domestic abuse services for support.**<sup>71</sup> For the period 1st April to 31 December 2020, the number of calls and contacts logged on the National Domestic Abuse Helpline run by Refuge (both incoming and outgoing) increased by 34% on the same period for the previous year (114,986 in 2020 vs 85,771 in 2019). This number only increases for specialist 'by and for' services, with Galop's national LGBT+ helpline experiencing a 36% increase in calls over the same period; Karma Nirvana's so-called 'honour-based' abuse helpline experiencing a 49% increase in calls; and the Respect helpline for male survivors experiencing a 39% increase in calls.

**During this period, frontline domestic abuse services have overwhelmingly reported that survivors are approaching services with higher and more complex support needs, including mental health problem and suicidal ideation.** This is in part because people are facing difficulties accessing statutory support services, who are also managing high levels of demand. The Agenda Alliance found that there are very few specialist trauma-informed mental health services in the UK for women.<sup>72</sup> Victims and survivors with mental health problems also face barriers accessing many other vital services due to strict eligibility criteria or not being able to engage in the way services require.

**The Government's 2018 Race Disparity Audit found that mental health issues such as anxiety and depression were most prevalent amongst black women:** in 2014, 29% of black women mental health issues in the week prior to being surveyed compared to 21% of white women and 16% of women of other white ethnicity. The survey also identified a clear need for health support among this group: 76% of victims surveyed stated they had a mental health support need, and 40% had a physical health support need.<sup>73</sup>

69 Annex B, [Funding allocation methods: new domestic abuse duty - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/531112/funding_allocation_methods_new_domestic_abuse_duty_-_gov_uk.pdf)

70 Chandan, J.S *et al.* (2019). 'Female survivors of intimate partner violence and risk of depression, anxiety and serious mental illness,' *The British Journal of Psychiatry*, 7:1-6. doi: 10.1192/bjp.2019.124.)

71 Please refer to our written submission to HASC (Feb 2021) for further information on the helpline data: <https://committees.parliament.uk/writtenevidence/22154/pdf/>

72 Agenda (2016), [Mental-health-briefing-FINAL.pdf \(weareagenda.org\)](https://www.agendaalliance.org/~/media/AgendaAlliance/Reports/Mental-health-briefing-FINAL.pdf)

73 Cabinet Office (2017), Race Disparity Audit Summary Findings from the Ethnicity Facts and Figures website [Microsoft Word - Revised RDA report March 2018.docx \(publishing.service.gov.uk\)](https://www.ethnicityfacts.org.uk/DocumentDownloads/2017/RDA_Summary_Findings.pdf)

Young women aged 20-24 are also the most likely group to experience domestic abuse, and the most at-risk group for poor mental health.<sup>74</sup>

### The solutions

- **The Domestic Abuse Commissioner is calling for additional investment in specialist mental health support. Timely and appropriate mental health interventions should be funded to address the rise in prevalence and complexity of women's mental health needs.** These services should be trauma-, gender-, and culturally-informed, as set out in the Women's Mental Health Taskforce's recommendations (2018).<sup>75</sup> The Commissioner recommends that this work is coordinated with the Toolkit for mental health trusts established in the Pathfinder Project.

### Projected costs

- There is currently very limited data available on the cost of specialist mental health interventions for domestic abuse victims. The Commissioner therefore recommends that the Department for Health and Social Care work closely with the specialist domestic abuse services and frontline line mental health services to cost and implement the recommendations from the Women's Mental Health Taskforce.
- **To support existing Mental Health Trusts to respond effectively to the rise in demand and complexity of victims and survivors of domestic abuse needing support, Mental Health Trust-based IDVA provision should be rolled-out nationally.** SafeLives' evaluation of the LINKS pilot in Barnet Enfield and Haringey Mental Health Trust in 2018 found that IDVAs based in Mental Health Trusts can achieve similar results to hospital-based IDVA services.<sup>76</sup> SafeLives' Cry for Health research published in 2016 calculated that the cost of providing hospital-based IDVA services (with a minimum of two FTE IDVAs per hospital at £100,000) would cost £15.7m to cover all acute hospitals (around 157).<sup>77</sup> The research also estimated that hospital-IDVAs would result in an annual saving to the public purse of £2,050 per victim in health service use.<sup>78</sup> It is important to note that the work of these IDVAs must run alongside the broader Pathfinder model (as outlined above) to ensure that they receive the wider support and development required to carry out the role successfully.

### Projected costs

- The Domestic Abuse Commissioner recommends that two FTE IDVAs are provided in each Trust. At £50,000 each across 54 acute Mental Health Trusts, this totals £16.2 million for three years, or £5.4million per annum.

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74 ONS (2018), Domestic abuse: findings from the Crime Survey for England and Wales: year ending March 2018, <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/domesticabusefindingsfromthecrimesurveyforenglandandwales/yearendingmarch2018#groups-of-people-most-likely-to-be-victims-of-domestic-abuse>

<sup>75</sup> Department for Health and Social Care (2018) [The Women's Mental Health Taskforce report \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/744447/the-women-s-mental-health-taskforce-report.pdf)

<sup>76</sup> SafeLives, *Barnet, Enfield and Haringey Mental Health Trust: Mental Health IDVA pilot evaluation 2018 (LINKS)*, [BEH-MHT LINKS pilot evaluation.pdf \(safelives.org.uk\)](https://www.safelives.org.uk/sites/default/files/resources/SAFJ4993_Themis_report_WEBcorrect.pdf)

<sup>77</sup> SafeLives (2016) *A Cry for*

*Health*: [http://www.safelives.org.uk/sites/default/files/resources/SAFJ4993\\_Themis\\_report\\_WEBcorrect.pdf](http://www.safelives.org.uk/sites/default/files/resources/SAFJ4993_Themis_report_WEBcorrect.pdf)

<sup>78</sup> SafeLives (2016) *A Cry for*

*Health*: [http://www.safelives.org.uk/sites/default/files/resources/SAFJ4993\\_Themis\\_report\\_WEBcorrect.pdf](http://www.safelives.org.uk/sites/default/files/resources/SAFJ4993_Themis_report_WEBcorrect.pdf)

## Behaviour change and intervention programmes for those who perpetrate domestic abuse

### Key issues

**There are currently an estimated total of 400,000 perpetrators causing high and medium levels of harm across England and Wales, however fewer than 1% receive specialist interventions for their behaviour.**<sup>79</sup> At present, the management of perpetrators of domestic abuse is left to the criminal justice system despite the fact that the majority of perpetrators will never be prosecuted for domestic abuse-related offences. There is also a lack of early interventions for young people exhibiting problematic behaviours and specialist interventions for women and LGBT perpetrators.

**There is currently a postcode lottery on the provision of domestic abuse perpetrator programmes, with it being left to local authorities or police forces to decide whether they should commission specialist services or create internal mechanisms for managing perpetrators outside of the criminal justice system, based on local priorities.** The postcode lottery is driven by the lack of funding available for perpetrator programmes, leaving police forces and local authorities to decide whether such funding should be made available for this, or for victim services.

**Additionally, funding which is made available is usually done so on a piecemeal basis rather than for long-term funding cycles.** This limits the scope of the kinds of programmes which agencies can commission, as most need longer than a year to have a long-term impact.

**Outside of MAPPA, there is no statutorily mandated framework for multi-agency working to manage perpetrators of domestic abuse.** Consequently, many local areas do not have formal structures for data and intelligence sharing, flagging individuals of concern or referral pathways. This can cause individuals exhibiting problematic behaviours to fall through the cracks and move between victims without repercussion.

### The solution

- **The Commissioner considers the best approach to perpetrator management to be one that focuses on coordinated multi-agency responses with proven effectiveness, such as MATAC and DRIVE.** Statutory agencies should be empowered to work together and use these structures to share intelligence, information and data with ease to ensure that perpetrators who come into contact with one of the agencies are referred for intervention. This can help identify perpetrators from an early stage and encourage interventions to prevent escalation of harm and risk. There is currently no programme of work in the College of Policing, National Police Chief's Council or the Home Office to promote the most effective ways to manage high harm perpetrators. The recent report from the HMICFRS on policing and VAWG found that "robust evaluation studies are needed on the different elements of the programmes to see what is most effective and how they should be implemented."<sup>80</sup>
- **Whilst both Drive and MATAC focus extensively on facilitating coordinated multi-agency responses to perpetrators of domestic abuse, the way in which they do this differs – hence why it is crucial to have both in place across England and Wales. MATAC is police-led, with the main purpose of MATAC being to reduce reoffending of the most harmful and serial domestic abuse**

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<sup>79</sup> Drive, A Domestic Abuse Perpetrator Strategy for England And Wales, A Call to Action [Call-to-action2021.pdf \(hubble-live-assets.s3.amazonaws.com\)](#) [accessed 29/09/2021]

<sup>80</sup> HMICFRS,

**perpetrators through preventing further offending and to safeguard victims and families.** As such, MATAC usually only captures perpetrators who are known to policing and the criminal justice system. Conversely, Drive seeks to prevent offending and through identifying high risk and high harm perpetrators of domestic abuse, whose cohort includes those who do not have any statutory agency involvement and may not have been convicted of domestic related offences. As SafeLives forms part of the Drive Partnership, this ensures that victim support remains central to the intervention, with the one-to-one case management model with perpetrators helping to provide the integrated holistic support to encourage behaviour change amongst the perpetrators they work with.

- **Such responses must be adequately funded – with long-term sustainable funding accompanying the Government’s proposed Perpetrator Strategy.** This will help give agencies confidence that they will be able to provide long term support and accountability to the individuals with whom they are working.
- **As part of this work, it will be crucial to deliver specialist interventions aimed at women, LGBT+ and minoritized perpetrators, for which funding should be made available for the purposes of developing programmes and building capacity for current interventions which have been proven to work.**
- Funding must be provided for the evaluation of programmes post-implementation in order to adequately assess long-term effectiveness of these programmes in creating behaviour change and preventing further abuse.

### Projected costs

- **The cost of conducting an in-depth evaluation of the current programmes which are in place across England and Wales and their effectiveness is highly variable.** The cost will depend on the extensiveness of the evaluation and the number of years which researchers will be comparing. An extensive evaluation of the programmes will require the development of a framework against which the programmes are assessed and will likely be more costly than a literature review of existing evaluations of programmes which may not provide adequate comparators. Consequently, it is difficult to provide a figure for this without guidance from academic researchers about how this is best carried out.
- **According to the MATAC evaluation<sup>81</sup>, the cost of rolling out the full programme across six police force areas was £3,152,428**, therefore the average cost per police force would be £525,404. If this was rolled out nationally across England and Wales, the total cost would be around £22.6 million for the first year. A social return on investment study carried out on the MATAC process showed a return of £14.09 in social value for every £1 invested, with a high percentage of this being from victim outcomes.<sup>82</sup>
- **The annual cost of delivering the Drive intervention model is around £300,000 per year per police force area**, with service provision for around 125 perpetrators per area. If this was rolled out nationally across England and Wales, the cost would be around £12.9 million per year. It is estimated that a fully implemented Drive model saves public agencies around £700,000 per year.<sup>83</sup>

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81 Northumbria OPCC and partners (2019), *Domestic Abuse: A Whole System Approach: Overall programme evaluation*, [dawsa-evaluation-overall-programme-reportfinal.pdf](https://dawsa-evaluation-overall-programme-reportfinal.pdf) ([cordisbright.co.uk](http://cordisbright.co.uk))

82 <http://n8prp.org.uk/wp-content/uploads/2017/06/MATAC-N8-presentation-final-11-June-2017.pdf>

83 University of Bristol (2019), *Evaluation of the Drive Project – A Three-year Pilot to Address High-risk, High-harm Perpetrators of Domestic Abuse*, [DriveYear3\\_UoBEvaluationReport\\_Final.pdf](https://driveproject.org.uk/DriveYear3_UoBEvaluationReport_Final.pdf) ([driveproject.org.uk](http://driveproject.org.uk))

## Domestic homicides and suicide oversight mechanism

### Key issue

**A quarter of homicides in England and Wales are recorded by police as domestic homicides.**<sup>84</sup> Despite the introduction of Domestic Homicide Reviews, there has been no significant reduction in the number of domestic homicides each year and we are very concerned that vital lessons are not being learnt – and changes effectively implemented - to prevent future deaths.<sup>85</sup> Further work is needed to identify broader policy change to prevent future deaths as well as following up on individual recommendations in local areas.

**Multi-agency Domestic Homicide Reviews play a critical role in examining the details of a death and important recommendations are made, but implementation of actions can drift and opportunities are missed to learn lessons at a national level.** Further work is needed to identify broader policy change to prevent future deaths as well as following up on individual recommendations in local areas, where following initial action implementation can falter as staff move on and attentions divert elsewhere.

### The solution

- **A clear oversight and accountability mechanism bringing together learning from a whole range of reviews and led by the Commissioner, would help to drive effective implementation and share lessons nationally in the long- as well as short-term.** The Commissioner's Office is uniquely placed to establish and deliver this oversight mechanism due to the independence of the Commissioner as well as the powers she has to hold statutory agencies and decision makers to account at a local and national level. Her links into local agencies and commissioners would also facilitate greater cooperation and understanding of the local landscape and the mechanism would make use of a range of reviews beyond just Domestic Homicide Reviews, such as Serious Case Reviews and Preventing Future Deaths Reports.

### Projected costs

- **£99,874 pa for 1 FTE SEO and 1 FTE EO.** The Domestic Abuse Commissioner's Office has a limited budget and would need to be appropriately resourced in order to establish and deliver the domestic homicides and suicides oversight mechanism effectively. This resource would enable the Commissioner's Office to make best use of the Commissioner's powers to identify common themes, conduct deep dives into particular issues, as well as follow up locally to ensure recommendations are implemented in the long term. A quarterly/bi-annual scorecard could be developed tracking implementation of DHR recommendations and shared with the Home Office, as well as annual reports which could be published on the DAC website.
- **The DAC is calling for an uplift in funding for our office in order to establish a clear oversight and accountability mechanism bringing together learning from a comprehensive range of reviews that take place when someone is murdered or takes their own life as a result of domestic abuse.** This mechanism would help to drive effective implementation of reviews and share lessons nationally in the long- as well as short-term.
- **The new oversight mechanism would need to prevent just one domestic homicide every 22 years in order to recoup its costs.**<sup>86</sup> We anticipate that the proposed new oversight mechanism – with its proactive reach into local agencies,

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<sup>84</sup> [Domestic abuse in England and Wales - Office for National Statistics \(ons.gov.uk\)](#)

<sup>85</sup> [Office for National Statistics](#) figures (England and Wales only) show a slight decline in domestic homicides, whilst those of the [10 year Femicide Census](#) (UK-wide) do not, each is calculated with different parameters

<sup>86</sup> Based on 2018 Home Office figures that the unit cost of a domestic homicide is £2.2 million in [The Economic and Social Costs of Domestic Abuse](#)

making use of the Commissioner's statutory powers – would prevent far more domestic homicides than this. We would recommend that any new oversight mechanism be robustly evaluated in order to ensure continued value for money.

## Appendix 1 Legal aid costs

Estimated cost for the provision of legal aid

Years	Cost of DA legal aid cases	Total DA cases with legal aid	Total PFL starts	40%	60%	Lower bound cost	Upper bound cost	Lower bound cost (£m)	Upper bound cost (£m)
2013-14	4222871 4	3027	54620	21848	32772	304794497	457191746	305	457
2014-15	4084554 9	3891	42105	16842	25263	176797928	265196891	177	265
2015-16	3628809 5	5028	43342	17336. 8	26005.2	125123199	187684799	125	188
2016-17	3370620 6	7585	48243	19297. 2	28945.8	85752854	128629281	86	129
2017-18	3305530 2	8331	50649	20259. 6	30389.4	80384971	120577457	80	121
2018-19	3079889 0	9781	51671	20668. 4	31002.6	65081666	97622499	65	98
2019-20	3233041 0	11459	54933	21973. 2	32959.8	61995162	92992743	62	93
2020-21	3629593 7	9407	55669	22267. 6	33401.4	85917233	128875849	86	129
<b>5 Year Average cost</b>	3323734 9						<b>5 year average</b>	<b>76</b>	<b>114</b>
							<b>Policy cost</b>	<b>43</b>	<b>81</b>

## Appendix 2: Domestic Abuse Commissioner's Office Mapping – project timeline

The Domestic Abuse Commissioner is undertaking the following steps to map the provision of domestic abuse services:

- 1. Feasibility study (completed):** In early 2021, the Domestic Abuse Commissioner undertook a feasibility study to map the provision of domestic abuse services in four local authority areas. This tested some of the approaches which we are using to gather data for our national mapping exercise.

2. **Identifying service providers across England and Wales (completed):** We identified over 600 organisations in England and Wales who provide support to domestic abuse victims and survivors. This extends to organisations who may provide more holistic VAWG support or whose focus may be on another form of VAWG (e.g. sexual violence).
3. **Service provider survey (completed):** In July 2021, we sent out a survey to each organisation requesting detailed information about their organisation, the services they provide, who it is for, and their funding landscape. The survey had a response rate of approximately 74%.
4. **Detailed analysis of responses / sector feedback (in progress):** We are undertaking analysis of results, including further engagement with services to clarify responses, as well as filling data gaps where organisations did not respond to the survey (either through desk-based research, engagement with commissioners, or further engagement with service providers).
5. **Victim / survivor engagement and focus groups (in progress):** We will be engaging with victims and survivors of domestic abuse to understand their experiences of domestic abuse services. We are currently exploring with the by and for sector how best to capture the voices of minoritised victims and survivors.

The final mapping report will be published and laid before parliament in 2022.

### Appendix 3 Calls to the National Domestic Abuse Helpline and Men's Advice Line

	1 Apr- 31 Dec 2019	1 Apr- 31 Dec 2020	4 Jan-18 Jul 2021	19 Jul-29 Aug 2021
Number of weeks	39.1	39.1	28	6
<b>National DA Helpline (Refuge)</b>				
Total calls in period	85,771	114,986	92,812	19,186
Average per week	2,191	2,938	3,315	3,198
<b>Men's Advice Line (Respect)</b>				
Total calls in period	16,945	23,536	17992	3890
Average per week	433	601	643	648

Source: Ministry of Justice Silver Command data (2021), Refuge, and Respect (2019/20).