



**domestic
abuse
commissioner**

Domestic Abuse Commissioner for England and Wales
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The Rt Hon Michael Gove MP
2 Marsham Street
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CC: Simon Hoare MP
Parliamentary Under Secretary of State (Local Government)

Felicity Buchan MP
Parliamentary Under Secretary of State (Housing and Homelessness)

Laura Farris MP
Parliamentary Under Secretary of State (Minister for Victims and Safeguarding)

The Rt Hon Edward Argar MP
Minister of State (Minister for Prisons, Parole and Probation)

David Johnston OBE MP
Parliamentary Under Secretary of State (Minister for Children, Families and Wellbeing)

27 February 2024

Dear Rt Hon Michael Gove MP,
cc Simon Hoare MP, Felicity Buchan MP, Laura Farris MP, David Johnston OBE MP

I am writing to you to express my serious concerns about the dire financial situation that many local authorities find themselves in, the resulting increase in Section 114 notices, and the impact that this is having on the multi-agency response to domestic abuse.

Domestic abuse is a heinous crime that affected 2.1 million people in England and Wales in the last year alone. In addition to this, estimates suggest that at least 1 in 5 children live with domestic abuse (Radford et al, 2011), and the welcome recognition in the Domestic Abuse Act (2021) that children are victims in their own right is likely to lead to an increase in identification, disclosures and thus demand for specialist support. Furthermore, domestic abuse has a significant impact not only on victims and survivors themselves but also on society as a whole – the Home Office estimated that domestic abuse costs society approximately £74 billion in a single year.

A holistic response to domestic abuse

The local response to domestic abuse is comprised of both statutory and non-statutory elements – these rely on one another to function effectively, support both adult and child victims, and bring perpetrators to justice.

Statutory services such as social care, housing, health and policing rely on independent, specialist domestic abuse services to function effectively. They offer referral pathways to support victims and survivors, provide advice to agencies and join the dots between an often complex and disparate system of public services. These non-statutory services provide vital safeguarding and necessary expertise in safety planning, risk assessment, emotional and practical support, support for children, recovery services, and behaviour change programmes, amongst other roles. This multi-agency response is vital in preventing serious further harm and even death.

Current financial pressures and funding landscape

Independent, specialist domestic abuse services are already under significant financial pressure. My office's [mapping research](#) found that, in 2020-2021, 27% of specialist domestic abuse services were forced to scale back or cease some of their services due to a lack of funding. This rises to 43% for the more specialist, 'by and for' organisations who support the most marginalised communities. This has only continued to worsen, with [research from Women's Aid](#) in November 2022 finding that over two-thirds of their member services would either need to turn survivors away from existing support, reduce support available, or close altogether as a result of funding constraints and the cost-of-living crisis.

In addition, service capacity has been hit by recruitment and retention difficulties, due to the uncertainty of future contracts amidst a cost-of-living crisis. Doves of experienced and knowledgeable staff are leaving the sector, and services struggle to recruit; I fear this will only continue to worsen as the funding landscape grows more dire.

As you will know, since 2018, eight councils across England have issued at least one Section 114 notice, and I understand that several other councils are at risk of having to issue notices soon. I understand and empathise with the incredibly difficult position that local commissioners are in as they make difficult financial decisions, especially in areas operating under Section 114 notices. Although I welcome the additional funding which the Government is providing to local councils through the Local Government Finance Settlement and Social Care Grant, I agree with the Local Government Association that this is not nearly enough to meet the pressures that they are facing – the LGA estimates that over the next two years, councils face a £4 billion funding gap.

On top of imminent financial demands, local areas are facing significant levels of uncertainty around the future of existing funding streams. The March 2025 cliff-edge for many national funding streams has led to hesitance around future funding decisions. This means that local authorities will begin to wind down and decommission services that they will not be able to afford without funding guaranteed. In fact, I have heard that this process has begun in some areas ahead of financial year 2024-2025, with specialist domestic abuse services facing severe funding cuts that could leave them non-operational.

One particularly concerning example is the provision of accommodation-based support under Part 4 of the Domestic Abuse Act (2021). At the time of writing, it is not

publicly known whether dedicated grant funding for accommodation-based services will continue beyond March 2025. Local authorities are already beginning to make decisions about what they think they can afford to commission whilst still ensuring that they fulfil the duty, and my office has already heard about provision being significantly cut for 2024/25. If funding is incorporated into the Local Government Settlement rather than remaining as a separate grant, there is a risk that it is spent elsewhere and that the provision of accommodation-based support is reduced to a point where it fails to meet local need, without consequence. The vast majority of local areas I have heard from support this funding remaining a separate Section 31 grant.

Consequences for victims and survivors of domestic abuse

Impact on non-statutory, specialist domestic abuse provision

The majority of specialist community-based domestic abuse services – that is, any services not covered by Part 4 of the Domestic Abuse Act which provides for accommodation-based services – are not statutory requirements and so are unprotected in the face of Local Authority financial difficulties. Ultimately, this is likely to lead to a significant reduction in provision and even the permanent closure of independent, specialist domestic abuse services. As a result, increasing numbers of survivors will fall through the cracks in provision, meaning that they will not receive a comprehensive, holistic response including prevention, early intervention or urgent help when they are in crisis – or they may not receive a response at all.

Most at risk will be victims and survivors from marginalised communities who require additional specialist or ‘by and for’ support. The additional barriers they face in accessing support will be compounded by a lack of provision to meet their needs. I am particularly concerned that the expertise brought by the specialist ‘by and for’ sector may be lost, as Local Authorities may seek to reduce costs by commissioning only a single larger provider. This will be a false economy as survivors will be unable to get the support that meets their needs.

Impact on statutory services

Without specialist domestic abuse services in the community, the demand on statutory agencies, and through statutory duties, will skyrocket. Without opportunities to support victims and survivors at an earlier stage, abuse may escalate and crisis response through accommodation-based services and children and adult social care will be left to pick up the pieces. This will transfer the financial burden onto already overwhelmed public services such as social care, housing, health and policing.

Additionally, it will remove the infrastructure which supports the statutory sector to function effectively to respond to domestic abuse. The majority of referrals into specialist domestic abuse services come from statutory partners, and community-based specialist domestic abuse services underpin the statutory response to domestic abuse. For example, without advocacy support, we know victims and survivors are far less likely to be able to support a criminal justice process – allowing perpetrators to evade justice and go on to further abuse others.

Recommendations

The picture is deeply concerning, and what was once a perilous financial situation is now nothing less than a state of crisis which will impact the response to domestic abuse, serious youth violence, and child protection, amongst other serious

community issues. Longer-term sustainable funding – on a statutory footing – is vital to protect and maintain these critical services in order to ensure that victims and survivors get the support they need and to prevent serious harm and homicide.

There is an opportunity now to address this. Through the Victims and Prisoner's Bill, I am supporting amendments which would ensure that:

1. The Joint Strategic Needs Assessments (JSNAs) and strategies produced under the Duty to Collaborate are accompanied by a National Statement, issued by Government. This statement would analyse these assessments at a national level, providing better information on need for victims and perpetrators and creating a shared national picture.
2. The National Statement would subsequently be used to identify the funding needed for specialist domestic abuse services and a duty placed on national government to meet this need.
3. Specialist 'by and for' services would be funded directly to meet the needs of minoritised victims and survivors through a duty placed on national government.

I am also supportive of amendments from the children's sector, which would introduce a Duty to Commission specialist support and advocacy services for children who have experienced abuse and exploitation.

However, there also must be immediate action taken to halt this crisis before it is too late. I would like to see your Department, in collaboration with the Home Office and the Ministry of Justice, issue guidance to local authorities on the necessity of independent, specialist domestic abuse services in fulfilling their statutory duties. I would also want to see an emergency pot of funding made available to local authorities to ensure they maintain specialist domestic abuse services in their area.

Furthermore, I would like to see clarity provided as soon as possible from your Department about the format and amount of future funding under Part 4 of the Domestic Abuse Act (2021). This will allow local authorities to plan for the future and maintain continuity in the provision of safe accommodation, building on the successes of the early years of the Duty.

I intend shortly to write to Ministers Farris and Argar separately in more detail to highlight the increased importance of the opportunities provided by the Victim and Prisoner's Bill in the context of Section 114 concerns. I will copy this letter to you for your reference. I will also be writing to all council leaders to emphasise the paramount importance of specialist domestic abuse services in order to fulfil their obligations to the public.

I would welcome a discussion at your earliest convenience about the work your Department is doing to maintain specialist domestic abuse provision within the context of local authority financial distress.

Yours sincerely,

Nicole Jacobs

A handwritten signature in black ink, reading "Nicola Jacobs". The signature is written in a cursive style with a long horizontal stroke at the end.

Domestic Abuse Commissioner for England and Wales