domestic abuse commissioner

BRIEFING PAPER

‘By and for’ funding pot

October 2024

Acknowledgements

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Contents

Why a 'by and for' pot is needed

Specialist domestic abuse services are an integral part of the response to domestic abuse. They are consistently working to deliver holistic and sustained support for survivors of domestic abuse so that they can recover safely and lead abuse-free lives. As specialist services are embedded within the grassroots, they are cognisant of the needs of the local communities they serve and are aware of the multiple overlapping challenges that they often face. As such, the specialist domestic abuse sector - and victims and survivors - have long recognised the value of specialist support delivered 'by and for' people from marginalised communities. This was supported by findings from the Domestic Abuse Commissioner's mapping report of domestic abuse services across England and Wales: '*A Patchwork of Provision*', which found that 67% Black and minoritised ethnic (BME) survivors, 68% LGBT survivors and 55% disabled survivors want to access specialist 'by and for' support delivered by their communities. Victims and survivors from marginalised communities want to receive this support because specialist 'by and for' organisations are better able to understand the context and complexity of abuse they face and build the trust critical to effectively assess risk and provide the right support. These organisations are also able to understand the intersecting layers of discrimination faced by victims and survivors from marginalised communities. This is reflected in the outcomes of these survivors, with those who access 'by and for' support feeling safer compared to those who have accessed other types of support or have not accessed any support.[1]

Support delivered

The support delivered through 'by and for' services is more effective in meeting the specific and intersecting needs of survivors.[2] The Domestic Abuse Commissioner's mapping report found a stark difference in the outcomes of marginalised survivors depending on whether they had accessed a 'by and for' service or not, with those who had demonstrating considerably better outcomes. Of the Black and minoritised ethnic survivors who accessed 'by and for' services,

[1] 'A Patchwork of Provisions' - Domestic Abuse Commissioner Report (2022), p43
[2] Imkaan (2020): Reclaiming Voice: Minoritised Women and Sexual Violence Key Findings

78% felt safer and 76% felt more in control of their lives, compared to 48% and 55% of those who had accessed another kind of service.[3]

'By and for' services are also more likely to provide accommodation-based services to migrant survivors with No Recourse to Public Funds. The Domestic Abuse Commissioner's mapping work found that 88% of 'by and for' organisations said they could provide this, compared to 62% of wider domestic abuse/VAWG organisations.[4] But as it stands, many 'by and for' services do not have the funding to enable them to provide such essential support.

Victims and survivors from marginalised communities face structural barriers to finding or accessing support, and services delivered from outside their community may fail to understand the complexity of the abuse they have experienced, or lack the trust needed for victims and survivors to disclose fully. This can also include a lack of cultural and faith-based awareness. 'By and for' organisations can provide additional support such as welfare advice, language interpreters, specialist counselling, and they will often work with victims and survivors for much longer periods of time.

Survivors have spoken to the Domestic Abuse Commissioner about how non-'by and for' services and wider agencies can struggle to provide them with the support they need. At worst, support delivered without a strong understanding of their intersectional identities and needs can make victims and survivors feel disbelieved, minimised, and sometimes worse than if they had not accessed services at all. For example, d/Deaf survivors have told how they have to work harder to get support from hearing services. Concerns included a lack of availability of BSL interpretation, use of different BSL interpreters at every appointment, and information being communicated in a format that is not accessible to BSL or visually-impaired sector service providers.

Funding barriers

Just 51% of Black and minoritised ethnic survivors who wanted access to specialist 'by and for' support were able to access it.[5] 19% of LGBT+ survivors who wanted specialist 'by and for' support received it, and 7% disabled survivors who

[3] 'A Patchwork of Provisions' - Domestic Abuse Commissioner Report (2022), p12
[4] 'A Patchwork of Provisions' - Domestic Abuse Commissioner Report (2022) p39
[5] This is likely to be an over-estimation, as specialist 'by and for' organisations supported the Commissioner in encouraging individuals accessing their service to complete the survey.

wanted to access a specialist 'by and for' organisation were able to.[6] For d/Deaf survivors, only 2 of the 30 people who wanted to access specialist 'by and for' support were able to.[7][8] Capacity within these services is a significant issue, with services struggling to meet demand and waiting lists being long in some cases.

'By and for' services are often disadvantaged in their funding arrangements. The Domestic Abuse Commissioner's mapping report found that 'by and for' services were six times less likely to receive statutory funding than specialist non-'by and for' domestic abuse/VAWG organisations and nearly twice as likely to have had to cease services due to lack of funding.[9]

The specialist support provided by 'by and for' services often results in them incurring higher running costs, rendering them disproportionately disadvantaged by the local commissioning process. The higher costs incurred are often a result of institutional advocacy on a wider range of issues, services extending beyond domestic abuse and addressing other forms of VAWG, and translation/interpreting costs. Few 'by and for' organisations receive large long-term contracts from commissioners. Instead, the funding of 'by and for' services tends to be reliant upon relatively small amounts, for short periods of time from a range of commissioning organisations. Short-term funding for 'by and for' services has a detrimental impact on staff turnover and retention of expertise, long term planning, proportion of staff time spent on recruitment and training, applying for funding and satisfying the information needs of multiple funders.

The Domestic Abuse Commissioner's service provider survey from November 2022 found that 'by and for' organisations are more likely to have a smaller annual income than other types of organisations, and many are reliant on funding from multiple different sources.[10] This is highly resource intensive as they are having to service lots of different funders. Over three quarters (77%) of the funding received by providers was under £100k. When the funding of services for amounts less than £100k was compared, 'by and for' services were more likely to be commissioned for less than £25k (57%) than other domestic abuse organisations (46%).[11] 'By and for' organisations are less likely to receive funding

[6] 'A Patchwork of Provision' - Domestic Abuse Commissioner Report (2022) p41
[7] Ibid.
[8] This is likely to be an over-estimation, as the survey was more accessible to people who had been able to access help e.g. through their 'by and for' service sending it on to them.
[9] 'A Patchwork of Provision' - Domestic Abuse Commissioner Report (2022) p41
[10] 'A Patchwork of Provision' -Domestic Abuse Commissioner Report (2022)
[11] 'A Patchwork of Provision' -Domestic Abuse Commissioner Report (2022)

from core local council budgets that other domestic abuse organisations. These disadvantages directly affect service provision.

'By and for' providers were much more likely to have ceased services because of funding, with nearly 20 percentage points between 'by and for' services and wider specialist VAWG/DA services.[12] A meagre 3.9% of all income for women's and girls' charities went to micro and small organisations – many of which are 'by and for' – despite accounting for 86.5% of the sector by number.[13]

Precarity in the specialist 'by and for' sector is a longstanding issue. A 2016 report from Imkaan found that in the space of a year, 50% of Black and minoritised ethnic 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.[14] In 2018, Imkaan reported that a combined income of 15 London-based BME organisations dedicated to tackling violence against women and girls is less than that of the main single provider in the capital.[15]

Such setbacks are even more concerning because specialist 'by and for' domestic abuse services ease pressure and capacity constraints on statutory services. In 2024, a report by Southall Black Sisters evidenced the cost benefit to those local public services of funding specialist 'by and for' interventions to victim-survivors of VAWG. By their calculations, local public services generate a net savings average of £18,024 per woman over three years when they fund specialist interventions. These interventions are provided by specialist services led 'by and for' Black, minoritised and migrant women working to end VAWG. When scaled up to a cohort of 40 women, £720,945 net savings are generated over three years; if applied nationally, the total net savings are estimated to be £127,012,499.[16]

The funding landscape compounds the marginalisation faced by victims and survivors: not only do they face additional barriers to accessing support, but the very support that is most needed is disproportionately underfunded and lacking in capacity.

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[12] A Patchwork of Provision' - Domestic Abuse Commissioner Report (2022) p43
[13] Rosa (2023): Mapping the UK Women and Girls Sector and its Funding p7
[14] Imkaan (2016). 'Capital Losses'. London: Imkaan
[15] Imkaan (2018). From survival to sustainability.
[16] Southall Black Sisters (2024): 'Investing in Safety' Report p4

The commissioning landscape

Where there is a lack of a critical mass of service users within a defined geographical area, the commissioning structure is such that bids are put out to cover large regions, which often overwhelms specialist 'by and for' services because they are simply unable to bid for contracts or grants too large or not appropriate for them to deliver. Too often, local commissioning bodies lack the understanding and capacity to commission multiple specialist services required to meet the needs of a diverse population, with many favouring fewer larger organisations who can deliver to a larger cohort of individuals but without meeting the needs of marginalised survivors. There are also barriers including requirements for funding applications to be submitted at short notice, encouraging small 'by and for' organisations to bid against each other, and only part-funding a post so further funding must be sought elsewhere.

Furthermore, there has been a marked increase in Local Authorities issuing Section 114 notices. Specialist 'by and for' service providers have raised their concerns around this, especially that this could result in local authorities only funding services they have a statutory duty to deliver (such as safe accommodation, statutory safeguarding response, DHRs, serious violence prevention duty, upcoming duty to collaborate). This leaves survivors of domestic abuse, especially those who are trying to access these specialist 'by and for' services in the community, at an increased risk of harm due to lack of services available to them in crisis and recovery.

Due in part to these uncertainties, the workforce of specialist 'by and for' domestic abuse service are in state of precarity. 'By and for' organisations report to the Commissioner that trained service staff are leaving, and services are unable to recruit until they are in a more stable position, which results in a severe loss of expertise.

There is also a risk of Local Authorities taking specialist domestic abuse services in-house when budgets are reduced or short-term. The independence of the domestic abuse sector is paramount, and this is lost when services are taken in-house. Additionally, this is not always cost effective, and a great deal of social value is lost. The lack of funding and support due to decommissioning, contracts ending early, and lack of re-commissioning puts smaller 'by and for' service provides at risk of irreversible closure and loss of invaluable expertise.

The postcode lottery

There are groups of survivors for whom access to this expert support is almost impossible because of the limited number of services across the country. There is a huge paucity of specialist 'by and for' services outside of (in particular) London and the South-East of England, and outside of large metropolitan areas more generally.

The mapping of specialist LGBT+ services conducted by Galop on behalf of the Domestic Abuse Commissioner's Office in 2021 found that specialist 'by and for' services were unavailable in many areas, particularly the South-West, and North East of England and in Wales.[17] Organisations 'by and for' Black and minoritised ethnic survivors are also heavily concentrated in London - of 58 organisations who self-identified through the Commissioner's mapping work as being 'by and for' Black and minoritised ethnic survivors and who provided location information, 28 provide support in London and the South East.[18]

Impact of a pot

A dedicated 'by and for' funding pot would begin to significantly address the barriers to 'by and for' services that have been outlined above. It would mean that minoritised and marginalised survivors are able to access the high-quality support that they need, no matter who they are or where they live. Moreover, it would build capability and understanding within more mainstream domestic abuse services, as well as statutory agencies, on the needs and experiences of marginalised survivors.

A dedicated funding pot would help to upskill services, local domestic abuse systems, and mainstream organisations. It would also improve the evidence base to facilitate improved and sustainable service delivery for all people impacted by or experiencing domestic abuse.

[17] Galop (2021): 'LGBT+ Domestic Abuse Service Provision Mapping Study

[18] 'A Patchwork of Provision' -Domestic Abuse Commissioner Technical Report (2022) p132

Proposal and Design

Definition of 'by and for'

'By and for' services are rooted in the communities they serve and may include wrap-around holistic recovery and support that addresses a victim or survivor's full range of intersecting needs, beyond purely domestic abuse support.

The DAC proposes that a dedicated 'by and for' funding pot would fund ***organisations that are designed for, and delivered by, people who are the most marginalised and minoritised at a societal level***, namely, **Black and minoritised ethnic, LGBT+, d/Deaf and disabled** victims and survivors of domestic abuse. This is consistent with the cohorts falling under the Government's definition of hate crime as well as in the Policing and Marginalised Groups Review[19], both of which recognise that these communities experience marginalisation at a societal level.

Additionally, these are communities spread across large geographic areas, where - particularly outside of metropolitan areas - population densities can often be low. This differentiates them from populations such as women, men, older survivors or children.[20] As such, specialist organisations supporting these groups would not be covered.[21] Nonetheless, if a survivor has intersectional characteristics which overlap with one of these cohorts, then they can be supported by a 'by and for' organisation.

We would recommend that a full Equality Impact Assessment is conducted to ensure due regard is paid to the impacts that this definition may have on different cohorts. Essentially, a sustainably funded 'by and for' sector would offer the choice to survivors from marginalised communities to decide whether their needs are best met through 'by and for' service provision or those provided by organisations in the wider specialist domestic abuse sector.

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[19] Policing and Marginalised Groups - GOV.UK (www.gov.uk) Hate crime | The Crown Prosecution Service (cps.gov.uk)

[20] The Commissioner will be encouraging government to go further through the Duty to Collaborate for a more explicit understanding and response to older survivors, children, and survivors who are men and women, ensuring that joint strategic needs assessments (JSNAs) include specific data on these groups. The DAC would also like to see a strategic approach to commissioning for these groups and the encouragement of partnership working at a regional level.

[21] The DAC acknowledges a slight policy change to her mapping report and initial response to the Victims' Bill, which defined 'by and for' organisations as organisations that are designed and delivered by and for people who are minoritised based on a broader range of characteristics, including race, disability, sexual orientation, transgender identity, religion or age.

Having a clear definition of the meaning of 'by and for', as outlined here, will allow for a more streamlined approach to ascertaining who is eligible to apply for the proposed funding.

Meeting need and building sustainability

The Government recognised the need to commission specialist 'by and for' services when it provided a funding stream for 'by and for' provision in the VAWG Specialist and Support Services Fund[22], explicitly acknowledging "we know that smaller 'by and for' organisations can face challenges in navigating local commissioning processes"[23]. In the past, the Ministry of Justice endeavoured to ensure 'by and for' organisations were contacted and considered via emergency COVID-19 funding through PCCs. At present, a sustainable, longer term strategic solution is necessary.

As has been set out earlier in this paper, due to low population densities, there is currently a difficulty to commission 'by and for' services locally and sustainably. The pot would commission these services at a national level in order to ensure need is met and the patchwork of provision is resolved. However:

- Where there are existing positive commissioning arrangements with specialist 'by and for' services at a local level, these should continue. For example, for 'by and for' communities in London, 'by and for' organisations must be commissioned locally (through local commissioners, and in future through the Duty to Collaborate).

- The pot should lead to long-term sustainability, including more regional collaboration with duty holders beyond each PCC's geographic boundaries. This is to encourage pooling resources and working across larger geographical areas.

The need and gaps would ideally be identified through a National Statement on need, which draws on the local Joint Strategic Needs Assessments produced as part of the new Victim and Prisoners Act Duty to Collaborate. This would provide a clear, robust, high quality, and routine picture of need and gaps for these 'by and for' communities and help to ensure investment is strategic, including by informing any new or updated cross-Government victims funding strategy.

[22] Funding boost for specialist victim support services - GOV.UK (www.gov.uk)
[23] Tackling violence against women and girls (publishing.service.gov.uk) p82

It may be the case that there is a high population density of a marginalised group in a certain area. In this instance, 'by and for' organisations supporting that cohort would still be eligible for funding but would be expected to upskill capacity and capability to cover a wider geographical area.

The pot would fund both capacity-building and the delivery of services to reflect the specific needs of local areas and existing services.

- **Capacity Building** - technical assistance and increases to the capacity of 'by and for' organisations. In some areas this would involve developing new provision, and in others this would be expanding the capacity of existing organisations. It would in part allow for scaling up, as well as costs of management, supervision, recruitment, monitoring and evaluation, comms and marketing, and bid writing. In cases where the intention is to create new provision, appropriate safeguarding procedures must be followed.

- **Delivery** - the delivery of existing services, including scaling up existing delivery models or establishing new provision in order to meet need.

This approach means the pot can be flexible and facilitate a staggered approach, acknowledging that there are multiple ways of building 'by and for' provision, and that different areas will be at different stages, and structured differently. The DAC would expect for capacity building to start as a higher proportion of the funding, but to decrease each year as services are upskilled and are able to deliver.

This innovation could also extend to **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**.

Proposed eligibility and principles

The DAC recognise that different 'by and for' organisations have different expectations and interests regarding what 'by and for' means for their community. For example, some organisations would prefer to identify 'by and for' based on the proportion of staff (including trustees and senior leadership) working in the organisation who are representative of the community they serve.

This can be more difficult to achieve for certain organisations, including for example organisations supporting d/Deaf and disabled survivors who need staff who are not a part of the community to support their work.

We would recommend a clear set of principles are created by Government, in consultation with 'by and for' organisations, to guide the allocation of this funding which flex to each community. It may be the case that Government chooses to defer to sector service standards when defining 'by and for' organisations (where these exist) to account for the different expectations in different communities. Government should also give consideration to leadership, governance and best practice when awarding the funding.

We acknowledge that 'by and for' organisations come in all sizes and for this reason size should not be a barrier to eligibility towards accessing the funding. This would allow small organisations to build their capacity and capability. Moreover, this pot would also cater to the needs of 'by and for' community initiatives that require funding towards creating new organisations.

While a generic or a specialist wider DA/VAWG organisation would not be eligible to apply for 'by and for' funding through this proposed pot, we would recommend that they could potentially serve as a facilitating partner in a collaborative bid with a 'by and for' organisation. Where this is the case, it should be ensured that the 'by and for' organisation is the lead partner and the parameters of the role played by the specialist or generic service is carefully outlined and adhered to.

Proposed bidding process and grant management

To successfully foster leadership and parity for 'by and for' services, the following challenges must be addressed and designed into the tendering process:

- Empowering 'by and for' organisations at different stages to plan with prospective partners to address viable options for partnerships. This may include consortia or the hosting of the 'by and for' work in a larger organisation.

- Making funding available upfront, where needed, to address start-up costs for small organisations who may not have built up reserves.

- **Keeping the bid process light and proportionate**, in acknowledgement of the challenges faced by organisations when applying for funding.

- Far-reaching advertising, allowing all eligible organisations and groups to hear about it.

- Giving sufficient advance notice, to enable organisations to build their bids in a way that is coherent for survivors and allows for partnership building with other specialist services and local strategic partners.

- Embedding appropriate cost-recovery, in order to assist in sustainability.

A national 'by and for' pot does not exclude planning and commissioning at the local level. This should be clear in the guidance underpinning the new Duty to Collaborate. The 'by and for' organisation would be funded directly, but the first stage of the tender process would involve planning with local strategic partnerships. This would allow for the least amount of disruption in areas where they have built up 'by and for' provision, and also allow 'by and for' organisations who would prefer larger organisations to partner with them to plan for this prior to the final tender.

In some cases, existing specialist services are incubating a 'by and for' organisation, or 'by and for' organisations have sought a partnership with an established specialist organisation. 'Loving Me' is such a case (see *Case Studies*). As such, there needs to be scope for flexibility in the design of the funding pot to ensure that such organisations are not excluded.

With regard to accountability for the organisations receiving funding, the DAC recommends sets of outcomes personalised to the individual needs of 'by and for' communities to capture what those organisations are doing on a holistic basis.

A flexible tendering approach based on local partnership building would allow consortia to be established or to build on existing work sharing expertise. We suggest that consortia be eligible to apply for funding and that particular commissioning arrangements be made with them to support this, provided that the consortia can demonstrate that they are not encroaching on the space of another 'by and for' organisation. The DAC also encourages the creation of

consortia between 'by and for' organisations for the sharing of learning as part of the grant management.

Wales

The DAC recommends that the proposed 'by and for' funding pot would cover both England and Wales. However, as Wales would not be covered by the proposed National Statement on need (drawn from JSNAs), we recommend that the UK Government work with VAWDASV leads in Wales to draw up the picture of 'by and for' provision. This should include discussing in detail sustainable funding guidance in Wales, the contextual landscape and appreciation of links between regional needs assessments.

The calculations and development of the proposal presented in this paper were undertaken with the cooperation of Welsh Government, which advised the DAC Office that the capacity building aspect of the pot for setting up new organisations would be a primary benefit for them.

The added complexities of devolution in Wales would need to be worked through in close collaboration with Welsh devolved bodies, the Welsh Government, UK Government, and the Welsh 'by and for' sector. The DAC is mindful of the boundaries of its remit with regards to devolved governance and independent VAWDASV funding, noting that while policing is reserved, health and local government are devolved matters. As such, the UK Government will also need to make sure the position is sustainable in the long term.

Costings for the 'by and for' pot

The DAC Office has worked closely with 'by and for' services to calculate the level of investment required to meet current levels of demand and expand capacity across England and Wales for Black and minoritised ethnic, disabled including d/Deaf, and LGBT+ 'by and for' organisations.

It is estimated that the proposed model (covering both capacity building and delivery of services) **would cost £564m to deliver over a three-year period.** This is broken down by community type in the table below. The full methodology is available in Annex A of this document.

Fig.1 Cost of 'by and for' funding pot for England and Wales

Category	Cost per annum	Cost over 3yrs
BME	£95m	£284.9m
LGBT+	£59.1m	£177.3m
Disabled incl. d/Deaf	£33.7m	£101.8m
Total	**£187.8m**	**£564m**

The DAC would stress that this figure is a conservative estimate of what is needed, due to wider cost-of-living pressures on specialist 'by and for' services. For example, Women's Aid's cost of living research found that 96% members were experiencing at least one of the following financial issues: increased rent for premises, other increased costs (e.g. food or supplies), funding not rising in line with costs or another financial issue as a result of the crisis.[24]

We suggest Government may want to consider this when awarding funding, and we would encourage and work with Government to conduct their own assessment of these costs. We would also encourage them to consider this alongside the level of funding provided for wider domestic abuse community-based services, as well as the real need for capacity building of organisations supporting other groups with particular needs, including older survivors, survivors facing multiple disadvantages and male survivors.

We propose that this cross-Government assessment of need should be made through a national statement and national oversight mechanism, linked to the Duty to Collaborate. The Duty to Collaborate will of course also extend to other types of crime; and indeed many 'by and for' domestic abuse organisations would support victims of other crimes. This pot could therefore run as a trial for other crime types, such as 'by and for' organisations supporting survivors of sexual violence and hate crimes. We would encourage Government to consider a future extension in line with the full Duty to Collaborate.

We recommend that Government work with the specialist 'by and for' sector to find appropriate thresholds for amounts of funding awarded, including ensuring that an organisation can materially and successfully deliver with the funding they are given.

[24] The cost of living crisis is pushing domestic abuse services to breaking point - Women's Aid (womensaid.org.uk)

Feedback from local commissioners

Through several roundtables held by the DAC Office with local commissioners from a wide range of regions, we found very supportive responses to our proposals from those in attendance. They were:

- on the whole, supportive of the funding being nationally allocated.
- supportive of the recommendation that assessors be trained and aware of the cultural nuances and niche service provisions that 'by and for' organisations have to offer.
- appreciative of the proposal of consortia and a more general push for strengthening regional collaborations.

A question arose around the issue of safeguarding - each local level commissioning body has its own set safeguarding policy which they expect all organisations functioning within their region to adhere to. In cases where 'by and for' organisations work across multiple commissioning areas, local commissioners proposed establishing a cross-local authority safeguarding policy, spanning multiple regions with the input of all local commissioning bodies involved.

Case Studies

In our engagements with the 'by and for' sector, certain key themes became apparent. The three case studies below highlight the different ways in which a 'by and for' pot is essential. The themes identified include the need for long-term and sustainable provision to allow for capacity building and retention of staff, and the expansion and growth of small organisations to enable them to broaden the scope of their delivery to more regions.

The Sharan Project

The Sharan Project, founded in 2008, is a U.K. based charity providing support and advice to vulnerable women, particularly of South Asian origin, who have been or are at risk of being disowned due to abuse or persecution resulting from Forced Marriage, potential, perceived or real threats and acts of Domestic Abuse, Honour-Based Abuse; Dowry Violence, Sexual identity, Cultural Conflict or indeed other forms of Harmful Practices.

The organisation offers services to educate, empower and inspire victims and survivors, by providing assistance on key life skills, as well as information and advice on a range of issues including health, housing, employment, education, financial, legal and personal development, to support vulnerable women in their transition to independent living without fear.

During the COVID-19 pandemic, The Sharan Project was for the first time deemed a 'priority service' and received a number of funds for small, grassroots and community services. Over time, this led to an overreliance on these funds as their service user needs increased and the organisation worked to meet these demands. Post-COVID-19, the funding they received has depleted as it was not long-term. The Sharan Project CEO, Polly Harrar, described that the 'rug was pulled out from under us' and it left services feeling 'unsettled' and 'unsecured for the future'.

The Sharan Project prides itself on taking 'a trauma informed, whole family approach' to ensure its service provision is client-led. However, there are currently no funds to support children and young people as victims of domestic abuse and family members of abuse as victims, survivors and witnesses.

Multiyear funding would allow some stability to the work of The Sharan Project. But a percentage of this fund could be ringfenced to offer to access practical support on capacity and sustainability building, such as upskilling/training, peer-to-peer learning, support with HR, IT, legal services, policy writing, governance and financial planning, and income stream development. This is sometimes offered but rarely materialises.

The Sharan Project, like many smaller 'by and for' organisations, can only deliver based on the level of funding received, so often they will be forced to reduce their services, or minimise what they can do, and this could lead to the loss of specialist services that so many rely upon.

A ring-fenced recurring multiyear funding pot tailored to their needs would allow 'by and for' organisations like The Sharan Project to thrive and increase capacity so that the needs of BME victims and survivors are met.

Deaf-initely Women

Deaf-initely Women is an organisation run 'by and for' D/deaf, D/deafblind and hard of hearing women. The organisation tackles discrimination, abuse and adversities faced by these women, and to support and empower them to live safe and free from domestic/sexual abuse; learn in an inclusive environment; gain work skills and experience; and to improve their health and well-being. It is the only D/deaf women-led organisation in the UK, and it seeks to expand nationally, currently working mainly in Derbyshire, and Nottinghamshire and surrounding areas. At present, their funding is mainly through Derbyshire and Nottinghamshire PCCs. Teresa Waldron, CEO of Deaf-initely Women, says 'there is no guarantee if and when the funding will be renewed. Often the decision as to whether funding will be renewed is made in December of the year prior'. This leads to a very precarious situation for the organisation.

Given the complex nature of the demands on their services, the requirement of qualified D/deaf IDVAs and Communication Professionals for example, BSL interpreters and translators who can support D/deaf survivors, the costs and time required to provide a service is doubled. This is the case for many 'by and for' service providers, as so many 'hidden' costs exist that are not incurred by other service providers.

Over the coming months and years, Deaf-initely Women intend to expand their specialist service. These include one-to-one support service that are D/deaf-affirming, trained IDVAs qualified in stalking, community outreach support and court work.

The additional costs of training staff and retaining them is a key strategic priority for the organisation. This cannot be attained unless sustained and recurring funding is available. The increased and sometimes hard to predict costs mean that annual funding streams for organisations like Deaf-initely Women are particularly hard to manage, in comparison to mainstream domestic abuse services.

Loving Me

Loving Me supports trans and non-binary victims and survivors of domestic abuse. They are the only national 'by and for' domestic abuse service provider for this group. As a 'by and for' service, their staff have a unique understanding of the specific needs of trans and non-binary victims and survivors. At present, they operate out of the Emily Davison Centre in Lancashire and are funded by Lancashire County Council and The Sam and Bella Sebba Charitable Foundation.

Loving Me was established in 2022, through funding from Ministry of Justice and Comic Relief. Since, then the organisation has developed and grown, and is now seeking to establish itself as an ongoing service provider for the trans and non-binary community. The service currently offers a domestic abuse support service covering the whole of England. Alongside this, the organisation delivers training to a range of colleagues in the domestic abuse sector.

In 2024, Loving Me opened a refuge specifically catering to the trans and non-binary community, the first of its kind in the UK. All of this has been accomplished with a small team and in order to build on this provision and to continue offering support to this highly marginalised and frequently excluded community, Loving Me needs dedicated and sustained funding.

Pre-existing funding models

MOPAC VAWG grassroots funding 2023-2025

MOPAC VAWG funding offers considerable learning opportunities and we recommend featuring aspects of this model into the administration of the 'by and for' funding pot.

In many ways, the MOPAC model serves as a microcosm of the proposed funding pot, given the difference in size and it being open to BME 'by and for' organisations only. For example, in MOPAC funding, individuals involved in the service were asked specifically about their expertise and qualifications, and were encouraged to question how this would be enhanced by the award of funding, and what they intend to give back.

This funding can also serve by example of the need to assess the size of the funds being granted (especially where this is large) and robustly manage contracts in order to ensure sustainability.

RASAF MOJ

In 2021, the Ministry of Justice (MoJ) made a commitment in the Rape Review Action Plan to conduct 'targeted research with rape victims to better understand their experiences and what they want from support services so that future provision meets need'.[25]

To meet this commitment and to fully inform the recommissioning of the Rape and Sexual Abuse Support Fund (RASAF), MoJ analysts and external contractors undertook three strands of research:

- A literature review of existing evidence
- A self-selecting survey conducted with adult victim-survivors
- Qualitative research with disabled adult victim-survivors

Rape and sexual abuse support services across England and Wales were awarded increased Government funding (22 March 2019) – totalling £24m over 3 years – to help even more victims.

[25] Formal support needs of adult victim-survivors of sexual violence (publishing.service.gov.uk)

Between 2019 and 2022, a total of 79 rape support centres across England and Wales have been awarded funding through the MoJ Rape and Sexual Abuse Support Fund to provide emotional and practical support to female and male victims of rape and sexual abuse, including victims of child sexual abuse.

Rape and sexual abuse support services in Cambridgeshire, Essex, Hampshire, London (MOPAC) and Nottinghamshire Police and Crime Commissioner (PCC) areas have been commissioned locally by their respective PCCs as part of the full local commissioning test.[26]

[26] Organisations awarded funding from the Rape Support Fund 2014–16 (publishing.service.gov.uk)

Annex A – costings methodology

Demographic data

Originally, the demographic data that we used was ONS Census data for England and Wales (inclusive). The methodology is based on using Women's Aid Federation England costings, which does not include Wales, and so we have reconfigured the demographic data to reflect England and Wales.

The total population of England and Wales is 59.6m people. The population of England is 56.5m and the population of Wales is 3.1m people, respectively.[27] That means 95% of the total population of England and Wales is in England and the remaining 5% is in Wales.

CSEW – DA statistics[28]

i) BME DA victims and survivors in England and Wales

	Asian	**Black**	**Mixed or multiple ethnic groups[29]**
Population size[30]	5,515,420	2,409,278	1,717,976
% that are DA victims[31]	2	3.5	7.9
Number of DA victims	110,308	84,325	135,720
Total number of BME DA victims	330,353		

[27] Population and household estimates, England and Wales: Census 2021 - GOV.UK (www.gov.uk)
[28] The DAC recognises that data from the CSEW presents conservative figures due to underreporting.
[29] ONS data categorises 'Mixed or multiple ethnic groups as one of the following: White and Asian; White and Black African; White and Black Caribbean; Other Mixed; and Multiple ethnic groups'.
[30] Ethnic group, England and Wales - Office for National Statistics (ons.gov.uk)
[31] Domestic abuse prevalence and trends, England and Wales - Office for National Statistics (ons.gov.uk)

Total BME DA victims and survivors in England and Wales = 330,353
BME DA victims and survivors in England, (95% of 330,353) = 313,836
BME DA victims and survivors in Wales, (5% of 329,000) = 16,518

ii) LGBT+ DA victims and survivors in England and Wales

	Lesbian, Gay	**Bisexual**	**Trans and Non-Binary**
Population size[32]	748,000	624,000	262,000
% that are DA victims[33]	7.6	17.3	15.1[34]
Number of DA victims	56,848	107,952	39,562
Total number of LGBT+ DA victims	204,362		

Total LGBT+ DA victims and survivors in England and Wales = 204,362
LGBT+ DA victims and survivors in England, (95% of 204,362) = 194,144
LGBT+ DA victims and survivors in Wales, (5% of 204,362) = 10,218

[32] Sexual orientation, England and Wales - Office for National Statistics (ons.gov.uk)
[33] Domestic abuse prevalence and trends, England and Wales - Office for National Statistics (ons.gov.uk)
[34] ONS have categorised this figure as Transgender, which we have taken to include non-binary as the other variable is Cisgender.

iii) Disabled including d/Deaf DA victims and survivors in England and Wales

	Disabled incl. d/Deaf
Population size[35]	10,470,000
% that are DA victims[36]	10.2
% with conditions that limit daily activities[37]	18
Number of Disabled incl. d/Deaf DA victims that are limited in their daily activities	192,229

Total disabled including d/Deaf (with limited daily activities) DA victims and survivors in England and Wales = 192,229
Disabled including d/Deaf (with limited daily activities) DA victims and survivors in England, (95% of 192,229) = 182,618
Disabled including d/Deaf (with limited daily activities) DA victims and survivors in Wales, (5% of 192,229) = 9,611

[35] Disability, England and Wales - Office for National Statistics (ons.gov.uk)
[36] Domestic abuse prevalence and trends, England and Wales - Office for National Statistics (ons.gov.uk)
[37] Disability, England and Wales - Office for National Statistics (ons.gov.uk)

iv) **DA victims and survivors**

Category	England	Wales	England and Wales
BME	313,836	16,518	330,354
LGBT+	194,144	10,218	204,362
Disabled incl. d/Deaf	182,618	9,611	192,229
Total	690,598	36,347	726,945

Women's Aid Federation England (WAFE) data on DA costings

In WAFE's 2024 annual audit, it was reported that a £427m[38] total sum would be required to cover DA costs for England.

The total population of DA victims and survivors in England and Wales = 2.1m[39]

So, population of DA victims and survivors in England alone = 2m

Population of DA victims in Wales alone = 100,000

The figure of £427m was divided by the number of DA victims and survivors in England (2m).

i) [Cost of pot for England without deflation]

Category	Calculation	Cost per annum	Cost over 3yrs
BME	313,836 x 214	£67m	£201m
LGBT+	194,144 x 214	£42m	£126m
Disabled incl. d/Deaf	182,618 x 214	£39m	£117m
Total		£148m	£444m

[38] Annual-Audit-2024-Summary.pdf (womensaid.org.uk)
[39] Domestic abuse in England and Wales overview - Office for National Statistics (ons.gov.uk)

Using mapping figures[40]

DA victims in England

BME: 67% of 313,836 = 210,270

LGBT+: 68% of 194,144 = 132,018

Disabled including d/Deaf : 40% of 182,618 = 73,047

i) Cost of pot for England (deflated)

Category	Calculation	Cost per annum	Cost over 3yrs
BME	210,270 x 214	£45m	£135m
LGBT+	132,018 x 214	£28m	£84m
Disabled incl. d/Deaf	73,047 x 214	£16m	£48m
Total		£89m	£267m

ii) Cost of pot for England (doubled for 'by and for' needs)[41]

Category	Calculation	Cost per annum	Cost over 3yrs
BME	45 x 2 =	£90m	£270m
LGBT+	28 x 2 =	£56m	£168m
Disabled incl. d/Deaf	16 x 2 =	£32m	£96m
Total		£178m	£534m

[40] In our 2022 mapping of services report, 'A Patchwork of Provision' - Domestic Abuse Commissioner we found the percentage of people in marginalised groups (BME, LGBT+ and disabled including deaf) who said they wanted access to 'by and for' services to provide them with the help they needed.

[41] Following detailed engagements with Women's Aid and 'by and for' organisations across the DA sector, the DAC was time and again informed of the 'doubling of costs' incurred by 'by and for' organisations as compared to mainstream DA service providers. 'By and for' organisations shared the amount of money and time required to provide their services and there was a consensus that overall, 'by and for' organisations require a doubling of costs. To reflect this, we have doubled the costing figures.

1. **Barnet consequential for Wales**

When UK Government gives money to England, they are obliged to give money to Wales, Northern Ireland etc. This formula accounts for issues involved in translation and economies of scale. This ratio is used to address the question of Wales funding.

Extra funding in Wales = Extra funding in England × Population proportion compared to England × The extent to which the relevant English departmental programme is comparable with the services carried out by the devolved administration.

Extra funding in Wales =
£178m x [3.1/56.5] x 100%= £9.8m
This would be £29.4m over a three-year period.

Cost of pot for Wales

Category	**Cost per annum**	**Cost over 3yrs**
BME	£5.0m	£14.9m
LGBT+	£3.1m	£9.3m
Disabled incl. d/Deaf	£1.7m	£5.2m
Total	£9.8m	£29.4m

Cost of 'by and for' funding pot for England and Wales

Category	**Cost per annum**	**Cost over 3yrs**
BME	£95m	£284.9m
LGBT+	£59.1m	£177.3m
Disabled incl. d/Deaf	£33.7m	£101.8m
Total	£187.8m	£564m

Annex B - Q&A

Q: *Does the proposed funding pot include women/ men/ older people?*

A: No, the Commissioner suggests that the pot is designed for people who are marginalised at a societal level (disabled, LGBT+ and Black and minoritised survivors). These groups also have much lower population densities overall. This is consistent with the government's definition of groups affected by hate crime. Nonetheless, if a woman, man, or older survivor, for example, has intersectional characteristics which overlap with one of these cohorts, then they can be supported by a 'by and for' organisation. We would recommend a full Equality Impact Assessment is conducted to ensure we are paying due regard to the impacts that this definition may have on different cohorts.

Q: *How will you recommend that the organisations receiving funding through the pot are 'by and for' the communities they serve?*

A: We are encouraging Government to give consideration to several factors, including the make-up and proportion of the staff and leadership of an organisation being representative of the community; the ethos and credentials of an organisation, and how far they are embedded in the community. Government should recognise the different circumstances of different organisations, including how for some D/Deaf and disabled specialist and 'by and for' organisations it is harder for them to have a high proportion of their staff from the community. The Government may wish to encourage alignment with the sector service standards for that group if they exist, recognising the different experiences of different cohorts.

Q: *How will you recommend the bid process isn't onerous for small organisations?*

A: We recommend that Government keep the bid process light and flexible (evidence on the need, what the service provides and how they qualify for 'by and for,' which could be signposting towards sector service standards, where they exist). We would encourage Government to request information on overheads, full cost recovery and reserves to encourage sustainability of the bids. If an organisation is successful, they would be required to conduct due diligence checks, of which would be made clear at the beginning of the application process (including safeguarding). Receipt of the grant would be dependent on these checks passing, and we would

encourage Government to run seminars/webinars to make the process as accessible as possible.

Q: *How will safeguarding be encouraged?*

A: All 'by and for' organisations are required to follow the local safeguarding procedures for children and vulnerable adults.

- As part of any Government funding pot there will be reporting mechanisms such as informing the grant provider (MoJ) of a safeguarding incident and grant requirements/due diligence, such as sharing safeguarding procedures. We would expect the MoJ to conduct due diligence checks and also construct these mechanisms appropriately and monitor the returns to ensure effective delivery.

- In addition to the MoJ oversight and required grant compliance, local authorities should work to join into 'by and for' services and appropriately support and assure safeguarding.

- Where more than one service has been commissioned for a community from the national pot, there should be cross-collaboration including safeguarding reviews. This again should be covered by investment from the national pot.

Q: *How will you recommend partnership bidding?*

A: We want to ensure that the bidding process is as flexible as possible and does not perpetuate existing issues with hierarchical partnerships. With that in mind, we propose that the process be one that empowers 'by and for' organisations in the negotiations around what a partnership would look like, and that this is done in connection with the local strategic partnerships.