

Domestic Abuse Commissioner submission to the Public Accounts Committee's inquiry into Tackling Violence Against Women and Girls 2025

Role of the Domestic Abuse Commissioner

The Domestic Abuse Act (2021) established in law the Office of the Domestic Abuse Commissioner for the purpose of providing public leadership on domestic abuse issues 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 agencies and Government to account.

Impact and cost of domestic abuse

Domestic abuse does not exist in a single form. It is unique to each person's situation and history. Different forms of domestic abuse, including controlling and coercive behaviours, coexist in most contexts and it is important to understand how power and control manifest in these situations. 'Race'/ethnicity, age, gender, religion, sexuality, socio economic status, immigration status, disability status and other ways in which victims/survivors identify plays a crucial role in their experience of abuse, its impact and their ability to access pathways of support and recovery. Specialist pathways of support as well as any attempt to understand victim/survivor needs should be responsive to the multiple contexts of oppression and vulnerabilities that they experience.

The impact and costs of domestic abuse to individuals and to society is vast – affecting an estimated 2.3 million adults and costs society £85 billion in a single year. One in five children also experience domestic abuse, and the Domestic Abuse Act (DAA) 2021 took the landmark step of recognising these children as victims in their own right. In its 2019 report, the economic and social costs of domestic abuse, the Home Office estimated that domestic abuse costs society approximately £66 billion in a single year, equating to around £85 billion in July 2024 prices.¹ Work is underway at the Home Office to update these figures, including reflecting the costs associated with child victims which are not included in the original figures. It is fair to assume these additional costs will be significant. Women's Aid's economic analysis with ResPublica in 2022 found a £9 saving to the public purse for every £1 invested.² Recognising the challenges of a tight fiscal environment, it is imperative to remember **that investment in reducing domestic abuse represents an investment to save.**

The cost of not doing so is too high.

In light of the recent National Audit Office report, the evidence below provides an update to the Public Accounts Committee on the impact of current government spending on tackling domestic abuse, and makes recommendations to improve the effectiveness of funding

¹ [The economic and social costs of domestic abuse - GOV.UK](#)

² [Investing to save: The economic case for funding specialist domestic abuse support](#)

structures and nature of investment to ensure the government is able to meet its commitment to halve violence against women and girls over the next decade.

Further detail on the investment needed for specific interventions required to successfully prevent and tackle domestic abuse are outlined in the [Commissioner's recent submission to the HM Treasury ahead of the forthcoming multi-year spending review](#).

Addressing the chronic underinvestment in domestic abuse and VAWG services

Issue: Failure to spend even the insufficient level of allocated funds for domestic abuse and violence against women and girls is leading to considerable gaps in provision.

The independent specialist domestic abuse sector is the backbone of support for victims and survivors across England and Wales. Its expertise, experience and dedication is unrivalled and has driven forward so much of the life-saving change we have seen over recent decades. Its services provide vital support to victims and survivors of domestic abuse, including counselling, refuge, safety planning and advocacy.

Organisations make herculean efforts in the most challenging of circumstances to provide a lifeline for survivors when their services are needed.³ This includes national domestic abuse helplines, which experienced soaring demand in recent years. Statutory services such as social care and policing rely on these specialist services to function effectively and prevent serious further harm, as part of a coordinated multi-agency response to domestic abuse. When specialist domestic abuse service and statutory services work together in effective partnership, victims and survivors feel better supported and better understood.⁴

Independent voluntary and community sector organisations bring in a considerable amount of funding from other sources, as almost no services received funding from a statutory funder alone. This demonstrates the ability of voluntary and community sector organisations to attract investment into a local area through applications to charitable trusts and other grant funders, and the added value they are able to bring. They can also innovate through funding acquired elsewhere, and make use of this learning in the delivery of their commissioned services.

Despite this, the Commissioner's 2022 mapping of specialist domestic abuse services, *A Patchwork of Provision*,⁵ identified a postcode lottery of support for victims and services, with services struggling to meet need. This was particularly acute for those services led 'by and for' minoritised communities. Today, the sector remains under-funded and undervalued, with funding piecemeal and services struggling to retain expert staff.⁶

The Local Authorities financial crisis now further threatens the specialist domestic abuse sector. The rise of Section 114 notices, whereupon Local Authorities strip funding of anything without a statutory duty, risks massive cuts to community-based services, which are essential to support victims and survivors, prevent escalation of harm and represent better value for money through earlier intervention.

³ Domestic abuse and Covid-19: A year into the pandemic (parliament.uk)

⁴ In Search of Excellence — Standing Together

⁵ 'A Patchwork of Provision' - Domestic Abuse Commissioner

⁶ Recruitment-Retention-in-the-VAWG-Sector-Recommendations-Final-2024-1.pdf (womensaid.org.uk)

High demand, inflation and rising employer national insurance contributions continue to present significant financial difficulties for the sector. For Women's Aid's 175 member organisations across England, the rise in National Insurance alone will cost them anywhere from £8,000 up to over £187,000 per annum, between £5,000- £82,000 for Rape Crisis services and for larger organisations such as Refuge and SafeLives incurring additional costs of £400,000 and £110,000 respectively.

Many services currently face a funding cliff-edge post March 2025, and need urgent clarity on and confirmation of future funding in order to continue their work. A third of Rape Crisis centre managers and directors are expecting to issue redundancy notices before the end of the financial year, with 30% of Rape Crisis directors concerned that they will have to close down their Rape Crisis centre altogether.⁷

The Commissioner is extremely concerned that despite the challenging funding landscape faced by these lifesaving services, the National Audit Office found that the Home Office has historically underspent its own budget allocated to the VAWG Strategy, by an average of 15% between 2021-22 and 2023-24. The approach will undoubtedly have contributed to the lack of progress in this area and that critical funds for VAWG were being redirected back from the Home Office into general funds.

Furthermore, as a result of the 2024 General Election, funding announced by the last government in the 2023 Autumn Statement of £10 million (due to be allocated in the year 2024/25) for the Tackling Economic Impacts of Domestic Abuse (TEIDA) was not awarded to organisations, leaving this fund unspent. TEIDA funding would have been critical to the Government's missions to kickstart economic growth and break down barriers to opportunities, and support the Government to deliver its commitment to halve VAWG in a decade. There has however been no further announcement on the allocation of this funding following the 2024 Autumn Spending Review, and the Commissioner is concerned that this dedicated spending initiative to tackle VAWG has been subsumed back into general funds.

Solutions

- Full details of the Domestic Abuse Commissioner's recommendations for the investment required in the specialist domestic abuse services are outlined in the submission made to HM Treasury. The Commissioner has made a series of recommendations which total **£865.8 million**.
- The Government must commit to ensure that any underspend on VAWG is reviewed at the end of each quarter and reallocated to vital lifesaving domestic abuse services.
- The new Government must honour the commitment made by the last government with regards to TEIDA funding.

Issue: Short term nature of funding and delays in funding announcements threaten the stability of support for survivors

The short-term nature of funding for domestic abuse and VAWG services, and delays in announcements of funding has had a significant impact on the ability of services to provide consistent and long-term support to victims and survivors of domestic abuse. The provision of very short contracts, of only a year or two, is highly inefficient. Often organisations are required to recruit and train staff at very short notice only to potentially close the service or make staff redundant a year later. In their 2023 annual audit of services, Women's Aid

⁷ According to Rape Crisis England & Wales' survey report, The Rape Crisis Funding Crisis 2024

reported that the most common challenge faced by domestic abuse services was funding, where short term contracts left organisations often unable to plan for the future.⁸

The Commissioner's 2022 mapping of specialist domestic abuse services, *A Patchwork of Provision*, found that most organisations (80%) received statutory funding as their main source of income, mostly from Local Authorities or Police and Crime Commissioners and that the often short-term and insecure nature of funding, meant that services struggled to build capacity and plan for the future, affecting efficiency, service delivery, along with recruitment and retention of staff.⁹ Most service providers (70%) relied on a main source of funding that was secured for less than three years, with over a quarter of organisations relying on a main source of funding that lasted than less than a year. This was particularly acute for 'by and for' organisations.

To provide an example, in the last decade, the Ministry of Justice established the Rape and Sexual Abuse Support Fund (RASASF), a ring-fenced fund for quality assured sexual violence and abuse services. The ring fencing of this fund has been extremely welcomed. However, as of August 2024, with no official commitment to extend or re-commission the RASASF past March 2025, Rape Crisis centres faced the agonising uncertainty of a funding cliff edge and must plan accordingly.¹⁰ A survey carried out by Rape Crisis England and Wales between May -June 2024 of managers and directors of Rape Crisis centre found that almost half (47%) were expecting a reduction in their core funding and that one third of managers and directors expected to issue redundancy notices in the next 12 months.

The Commissioner was also aware that following the Autumn Spending Review 2024, national domestic abuse helplines, commissioned by the Home Office, have received less than two months notice of funding details before the end of the financial year 2024/25 ahead of contracts due to commence in 2025/26.

As well as cuts to services, the delays to funding announcements has resulted in an increase in the commissioning of in-house services over specialist services because local commissioners have limited time to carry out a lengthier tendering process. The Commissioner's 2022 mapping of specialist domestic abuse services, *A Patchwork of Provision*,¹¹ highlighted that the independence of services was critical in securing the trust of victims and survivors. We heard from victims and survivors struggling to trust statutory agencies, and any service that was situated within a public sector body, could struggle to secure the trust of victims and survivors to fully disclose their abuse, and thus hamper the service's ability to support them or assess risk. This was particularly the case for victims and survivors from minoritised communities.

Women's Aid have noted a sharp increase in the number of councils bringing services in-house. FOI request sent to all local authorities in England in 2023 by Women's Aid, found that, 52.0% (102) of responding local authorities reported that they provided one or more in-house service.[1] One frontline service in response notes that " *In-house commissioning also erodes the boundaries of what counts as a 'specialist service' – we would not say that a statutory IDVA service falls into the definition, but the local authority does refer to this as a specialist service.*" Women's Aid noted that in one area, a council that is well known to be

⁸ Women's Aid, 'The Domestic Abuse Report 2023: The Annual Audit', 2023. Available online: <https://www.womensaid.org.uk/wp-content/uploads/2023/01/The-Domestic-Abuse-Report-2023-The-Annual-AuditFINAL.pdf>, accessed 20 May 2024

⁹ [Domestic Abuse Commissioner \(2022\), A Patchwork of Provision.](#)

¹⁰ [Rape Crisis centres at risk of closure without a commitment to continued funding after March 2025 | Rape Crisis England & Wales](#)

¹¹ 'A Patchwork of Provision' - Domestic Abuse Commissioner

facing the need to issue a section 114 notice, has announced they will be expanding in-house provision, whilst the only specialist provider in the area, which has been open for a number of decades, is being forced to close.

Solutions:

- National government must ensure that there is at least a six-month period between the award of national funds to local areas before contracts are due to come to an end to prevent the closure of services and staff redundancies. Similarly, national government should provide organisations that it funds directly (e.g. national domestic abuse helplines) with six months notice before a contract is due to extend or whether it intends to renew or cease the contract and the level of funding which will be awarded.
- The forthcoming multi-year Spending Review provides the government with the opportunity to guarantee much longer-term sustainable investment for organisations. National government must work with local commissioners to ensure that where possible contracts are awarded for at least three years and that specialist organisations receive year on year inflationary uplifts. Local areas should consider, alongside longer-term contracts, where funding for innovation can still be made to ensure that we are building evidence on what works best to tackle domestic abuse and VAWG, particularly for minoritised communities.
- The Victims Funding Strategy, and national guidance for commissioners on the commissioning of services (including guidance issues under Part 4 of the Domestic Abuse Act), should set out clearly the importance of independent services in any statutory or non-statutory guidance. Where services are brought in-house, this information should be shared with the Ministry of Justice, Home Office, Ministry of Housing, Communities and Local Government and with the Domestic Abuse Commissioner's Office to understand why and to monitor changes over time.

Issue: Lack of coordination across central government on spending on domestic abuse and VAWG

The solutions required to prevent and tackle domestic abuse sit across a range of government departments. Despite the need for a robust cross-government approach, the Commissioner shared the concerns outlined in the National Audit Office's report that there is no wider oversight of all government funding to support tackling VAWG. As noted by the NAO, despite acting as the lead department on the issue, the Home Office does not track or coordinate spending by other government departments. The report found that at least £979 million was spent by other government departments between 2021-22 and 2023-2 and that there are examples of where government departments may be competing for the same services particularly with regards to community-based services. To provide a specific example of the lack of coordination, both the Ministry of Justice and Home Office currently commission national domestic abuse helplines. This approach will inevitably lead to inefficiencies in commissioning and an overall lack of understanding of the true scale and nature of survivors needs, leading to a poor use of public funds.

Solutions

- The Home Office should work closely with other key government departments, including the Ministry of Justice, Ministry for Housing, Communities and Local Government, Department for Health and Social Care and the Department for Education to submit joint bids for the forthcoming Spending Review.

- As noted below the Cabinet Office should appoint a Deputy Director whose role is to track and promote cross departmental work on domestic abuse and VAWG.
- Develop a standardised cross-government definition of specialist VAWG services as well as by and for services and an evaluation framework and metrics (which can be used by national government and local commissioners) and can sensitively capture the value of independent specialist and by and for services, including longer term outcomes for victims and survivors of domestic abuse.

Issue: Investment in programmes with a lack of safeguarding measures

Over the past five years, the Commissioner has raised safeguarding concerns regarding a number of schemes that government have invested directly in. A lack of ongoing evaluation has resulted in a failure to highlight serious delivery issues which ultimately pose a significant risk for survivors. This represents poor value for money given the desperate need of funding within the specialist domestic abuse sector.

The Reducing Parental Conflict Programme

From 2018—2025 the Reducing Parental Conflict Programme received £83m from the Department of Work and Pensions (DWP).¹² Despite significant investment, the Commissioner has safeguarding concerns about the programme and the lack of safeguarding measures put in place to protect victims and survivors of domestic abuse.

Safeguarding concerns include:

- The third evaluation of the RPC Programme made reference to levels of conflict having ‘passed the domestic abuse thresholds’, that ‘the RPC programme seeks to address conflict below the threshold of domestic abuse’, and that ‘parents came to interventions with varying levels of conflict, from no conflict through to accusations of domestic abuse.’¹³ This significant misunderstanding is engendering confusion among frontline professionals, risks victim blaming, and limits professionals ability to spot the signs of coercive control and take action to keep families safe.
- In the Final Evaluation of the programme, evaluators contended that ‘a key early challenge local authorities reported was working out at what point conflict in a relationship becomes abusive. They appreciated that conflict in relationships was very common and were struggling to find mechanisms to help distinguish between acceptable and unacceptable conflict. Knowledge and understanding of the three key elements of domestic abuse (power imbalance, fear and control) was not widespread.’¹⁴
- This evaluation also found that for onwards referrals from RPC to another service, 10% accessed domestic abuse support, rising to 20% between 6-12 months after programme completion.¹⁵ Moreover, the third evaluation of the programme found that amongst participants in parental conflict programmes were those who had experienced domestic abuse, mentioning physical assault, coercive control and stalking.¹⁶

As such, inappropriate referrals are being made, and domestic abuse screening prior to enrolment on the programme is ineffective or is not taking place. The programme lacks the necessary input from specialist domestic abuse services, in providing training to practitioners

¹² Department for Work and Pensions (2024b).

¹³ Department for Work and Pensions (2022).

¹⁴ Department for Work and Pensions (2023).

¹⁵ Department for Work and Pensions (2023).

¹⁶ Department for Work and Pensions (2022).

on recognising coercive and controlling behaviour, and also identifying cases of domestic abuse. This put victims and survivors at significant risk, and will ultimately, be at a cost to their wellbeing, and the public purse.

Value for money

Despite the high cost of domestic abuse to society (particularly in comparison to parental conflict), the RPC Programme does little to safeguard victims of domestic abuse, and in some cases, may be causing further harm. After years of considerable investment, the Government must reset the boundaries of the programme, to ensure that going forward, the issues set out in the evaluation are addressed.

The Commissioner is clear that in order to improve the value for money of the programme, and safeguard victims of domestic abuse, the Department for Work and Pensions should embed flexibility in funding to allow local areas to use RPC funding as needed for domestic abuse services, as well as any RPC programme that is needed. At present, the funding is too restrictive, and does not enable local areas the flexibility to meet local need.

The Commissioner will make further recommendations on how to improve the value for money and delivery of the Programme in her upcoming policy report.

Ask for Ani

The Ask for Ani Pharmacy scheme served as a tool during the Covid-19 pandemic to heighten awareness of domestic abuse and provide a known safe space for survivors when safe spaces were limited. In this case, the safe spaces were pharmacies which signed up to the scheme. By the end of the scheme, it was clear that it posed a number of safeguarding risks as a result of delivery issues.

Safeguarding concerns included:

-There was a lack of consultation with local strategic leads before launching the initiative, to ascertain localised referral pathways to support, joint comms, local oversight etc.

-That there was no process in place or consideration in place to ascertain if the person responding to a victim had local connections to a person engaging in harmful behaviour, or was a safe person to disclose to.

-The training content was not comprehensive and had significant gaps – such as how to identify domestic abuse, respond appropriately, risk assesses, engage appropriate third parties and make robust and legally sound notes.

-There was a lack of standards and expectations on where disclosures were recorded and if disclosures were being recorded properly.

-There was no clinical supervision or internal support for staff dealing with sensitive and potentially complex cases.

- There was no formalised process for staff to escalate concerns, or risk assess these cases in live time with a specialist. This risked the victim not getting a trauma informed response when most needed, and risked the victim choosing not to seek support, and go back to a perpetrator.

There was an absence of important, and basic, data. Such as:

- a. Which pharmacies were signed up to the scheme.
- b. Which pharmacies were delivering the scheme.
- c. Which pharmacies had the appropriate training to deliver the scheme.

In addition, a mystery shopper exercise conducted in 2022 found that just 2/7 of the pharmacies signed up to the scheme understood what the mystery shopper was referring to by 'Asking for Ani'.¹⁷ Meaning that many victims and survivors could have been turned away from support, at a significant point of crisis.

These implications made the scheme unsafe.

Value for money

The absence of data inhibited the ability to measure the impact and efficacy of the scheme as well as preventing appropriate quality assurance. We therefore do not know:

- a. The cost effectiveness of the scheme.
- b. Which pharmacies should have been spot checked to ensure quality delivery.
- c. How many disclosures were made.
- d. How many victims were/were not offered support.

As such, we do not know if Ask for Ani offered good value for money, but evidence and testimony from the local frontline response would suggest not. With disclosures not always being recorded, there was no clear picture on how many victims disclosed through the scheme, nor do we know if Ask for Ani had a positive impact on victims— for example, through getting support from a specialist service through the scheme.

In the face of so many other priorities in the response to domestic abuse, many of which with an evidence base to invest in, it is clear that the Ask for Ani Scheme did not represent good value for money, and the £300,000 investment should have been prioritised elsewhere in the response to domestic abuse.

The scheme continues to run in Job Centres, rolled out by the Department for Work and Pensions, and again, there is little understanding as to the cost effectiveness, disclosures, and safety of the scheme.

Furthermore, Respect, a UK charity working to stop perpetrators and support male victims has highlighted to the Commissioner concerns that the previous round of Home Office Perpetrator fund did not meet the Home Office's own accreditation standards for perpetrator programmes. This is not only poor practice but risk placing victims of domestic at further danger.

Solutions:

- The Government should invest in evidence gathering of what works to prevent and end domestic abuse and VAWG, to ensure future VAWG interventions are based on robust evidence. To achieve its mission of halving VAWG in a decade, the government will need the best available evidence on which interventions will be most effective. The Commissioner recommends that this work is coordinated with the National Centre for VAWG and Public Protection. This work should look specifically to assist the government to

¹⁷ [I used codeword 'ANI' at pharmacies to see if the scheme works | Oxford Mail](#)

- Prioritise prevention, developing a robust evidence base on what works to prevent domestic abuse and VAWG, in addition to crisis-based interventions. For the purpose of this work, the definition of prevention should include universal prevention, early targeted intervention at groups of individuals who are deemed to be most at risk and early intervention for those subject to domestic abuse to prevent further harm.
- Develop a standardised definition of specialist VAWG services as well as by and for services
- Develop a robust cross government evaluation framework and metrics (that can be used by national government and local commissioners) which sensitively captures the value of independent specialist and by and for services, including longer term outcomes for victims and survivors of domestic abuse.
- Ensure that the evaluation framework is ethical. For example, there are certain methods including Randomised Control Trials that would not be appropriate to use in the context of domestic abuse. External experts and the specialist domestic abuse sector should be commissioned to co-produce best practice principles on evaluation of interventions with adult and child victims and survivors of domestic abuse.

Greater investment in prevention and early intervention

Issue: work to prevent domestic abuse upstream and intervene early is vital in helping to reduce rates of victimisation. However, current government spend is disproportionately focused on the crisis response to domestic abuse. Without this shift in spending, the government will struggle to meet its commitment to halve VAWG over the next decade.

To do this successfully public services must work together in a coordinated community response to domestic abuse. Key public services, including health, housing and education should work together with the support of specialist domestic abuse services to identify harmful behaviours and early signs of abuse. The coordination of key government departments to commission services in a range of spheres is essential to achieving multiagency working at the local level.

To date the Home Office has acted as the lead department for implementing strategies to tackle VAWG and domestic abuse. Whilst the Home Office has a significant role to play in coordinating the policing response, it is not well placed to act as a wider convening power in relation to prevention and early intervention, where work has the potential to take place within the spheres of health, education and local government etc. The recent report from the National Audit Office (NAO) has highlighted the limits of this approach and the lack of cross-government working in implementing the last VAWG strategy, published in 2021.¹⁸ The report noted that the Home Office had not centrally coordinated funding for VAWG across government and, in contrast with the 2021 illegal drugs strategy, the relevant departments did not prepare a joint spending review bid during the period of implementing the VAWG Strategy.

Prioritising prevention activity within the response to domestic abuse has been well established in academia¹⁹ and recognised for some time in national²⁰ and local government strategies. In the current fiscal environment, prevention activity has mostly been deprioritised

¹⁸ [013939 - PRESS ONLY - Tackling VAWG Report HC 547.pdf](#)

¹⁹ Wolfe, D.A. and Jaffe, P.G. (1999).

²⁰ Home Office (2021).

at both a national government level and in local commissioning decisions, with funding being directed towards the risk-based, crisis response.

Although prevention was one of the key pillars of both the VAWG Strategy and Domestic Abuse Plan, the majority of the Home Office's specific prevention activity is focused on addressing re-offending, as opposed to preventing VAWG in the first place.²¹

The National Audit Office found that a quarter of commitments relating to prevention were allocated to the Department for Education – yet the department only spent £0.52 million across all outputs related to the VAWG Strategy or Domestic Abuse Plan between 2021-22 and 2023-24 and most of this funding was spent on supporting victims, rather than prevention.²² Similarly, in 2022-23, in an exercise to reallocate funding, the Home Office considered 23 activities, but only two referenced prevention activity.²³

What is more, there is a legislative gap with regards to the prevention of domestic abuse and VAWG, which has led to a lack of joined up and strategic planning at a local level to tackle these crime types at the root.

While provision of safe accommodation is rightly a statutory duty, to solely fund this represents a false economy and fails to cover the vast majority of victims and survivors who access support in the community. Community-based support for victims and survivors, alongside perpetrator interventions, prevent future harm and the significant costs incurred by that harm. Investment in long-term, sustainable funding, which doesn't leave services and survivors at the mercy of crisis after crisis, represents real value for money and a saving on future costs.

Solutions

- The Commissioner's submission to HM Treasury Spending Review 2025 outlines a full range of prevention interventions required to halve VAWG in the next decade. See [here](#) for further detail on spend.
- Prevention must be more than simply a pillar in the forthcoming VAWG strategy. Government should ensure that it is threaded through all elements of the forthcoming strategy and the wider Safer Streets mission.
- Appoint a Deputy Director in the Cabinet Office whose role is to track and promote cross departmental work on VAWG. This role will be vital in ensuring that all departments, including the Department for Education and the Department for Health and Social Care play a more prominent role in the upstream prevention of domestic abuse and VAWG.
- The Home Office must play a greater role in holding local areas to account which do not, despite the updated definition of serious violence to include domestic abuse and VAWG, include these crime types in their serious violence prevention strategies. This area of work provides a vital opportunity to ensure that local areas have a more joined up and strategic response to the prevention of domestic abuse and VAWG.

Greater resources focused on early intervention for children who are subject to domestic abuse

Upstream prevention specialist community-based services, which can intervene early, are vital in the support of children as victims of domestic abuse. Despite the Domestic Abuse Act's (2021) landmark step forward of recognising children as victims of domestic abuse in their own right, to date, little has been done to support or guide agencies locally to address a chronic lack of awareness or clarity as to what this means in practice. Children's legal status

²¹ National Audit Office (2025).

²² National Audit Office (2025).

²³ National Audit Office (2025).

as victims has brought little tangible change in terms of the delivery of services. Moving forward, cross-government funding of upstream prevention and early intervention community-based funding must include a dedicated funding pot for children.

Between 2010-11 and 2022-23, expenditure on early intervention services fell by 44%. As a result, early intervention spending made up less than one-fifth (18%) of total spending on children's services, down from over one-third (36%) in 2010-11.²⁴ By comparison, spending on late intervention services and the crisis response has increased by 57% during this time.²⁵ As a result, what are meant to be universal support offerings, like Family Hubs and family support services, have to prioritise working with children in higher risk circumstances, due to a lack of funding, and missed opportunities for earlier intervention.

The Commissioner has undertaken an ambitious research, policy and practice report that maps provision of services, understands best practice, offer policy solutions, and reflect the voices of children themselves. Front-line workers have been extensively engaged to ensure recommendations are practicable and based in the reality of operational work. It has been well established in research that experiencing domestic abuse can have many developmental, behavioural and emotional impacts on children. Meltzer et al found that children who had experienced domestic abuse had almost three times the likelihood of having conduct disorders, such as repeated anti-social behaviour, compared to peers.²⁶ Childhood exposure is serious, consequential and not only comes at a cost to the wellbeing and outcomes of children, but at a huge cost to society. Work to date highlights the alarming prevalence of domestic abuse cases in the social care system. Children's Social Care assessments record domestic abuse in around 50% of cases, which is the most common adverse background factor listed for children deemed in need of support. This figure is widely believed to be underestimated. Despite this, social workers reported, during roundtables held by the Commissioner's Office, only receiving a day of training on domestic abuse, and difficulty spotting the signs of controlling and coercive behaviour. Similarly, teachers and Designated Safeguarding Leads also reported a lack of training and confidence in effectively handling disclosures and conversations around domestic abuse. This is compounded by a lack of specialist support services for children, with the Commissioner's previous mapping finding that just 29% of victims who wanted support for their child were able to access it²⁷. As a result of this fractured system, children are falling through the cracks and not receiving the statutory and non-statutory support which they deserve. The final report, due for publication in April 2025, will set out a roadmap for improving the response to children subject to domestic abuse, with, where possible costed policy recommendations.

Solutions

In addition to the spend outlined in the Commissioner submission to HM Treasury Spending Review phase two, the Commissioner makes the following recommendations to improve the efficiency and effectiveness of funding for services targeted at supporting children subject to domestic abuse.

- Government focuses on child victims at the VAWG Ministerial Board, culminating in an annual progress report and agreed metrics to assess accountability. This should be done through the creation of a cross Government working group, specifically focused on child victims of domestic abuse, jointly led by the Department for Education and the Home Office.

²⁴ Probono Economics (2024).

²⁵ Probono Economics (2024).

²⁶ Meltzer, H., Doos, L., Vostanis, P., Ford, T. and Goodman, R. (2009) 'The mental health of children who witness domestic violence', *Child & Family Social Work*, vol. 14(4), pp. 491–501.

²⁷ ['A Patchwork of Provision' - Domestic Abuse Commissioner](#)

- Government appoints a domestic abuse strategic lead role at the Cabinet Office, whose role it would be to strengthen the cross-government response to domestic abuse, lead on the children's elements of the upcoming VAWG strategy, centralise and coordinate the cross-government response to domestic abuse, and, feedback progress directly to Number 10.
- Government must focus on child victims at the VAWG Ministerial Board, culminating in an annual progress report and agreed metrics to assess accountability. This should be done through the creation of a cross Government working group, specifically focused on child victims of domestic abuse, jointly led by the Department for Education and the Home Office.
- Government introduce a statutory duty and pool funding for community-based services for all child and adult victims and survivors of domestic abuse, based on local needs assessment, taking into account increased referrals as a result of the recognition that children are victims in their own right.
- Home Office update the guidance on commissioning services to support victims and survivors of Violence Against Women and Girls, to significantly strengthen the content related to child victims of domestic abuse and consider their individual, intersectional needs

For any funding injection to represent best value for money, it is imperative that its roll out is considered, and that there is a commitment to embedding specialist expertise throughout the entirety of the process. Similarly, it is critical that staff delivering interventions are given the time to meaningfully contribute to the evaluation process, for the evaluators to be mindful of the pressures placed on these services, burnout and not overwhelm services. Effective evaluation and data gathering requires appropriate resourcing and capacity building in the sector, to provide better quality evidence.

Evaluation is an important lever of work to ensure that services are effectively supporting children, and to maximise public funds. Therefore, **the Commissioner recommends a phased approach that enables capacity building, creating a shared understanding across the sector that prioritises embedding the views and needs of children, domestic abuse specialist expertise, and then evaluating interventions when they are ready.**

The Commissioner recommends phases of this work as follows:

- **Phase 1:** Based on the Domestic Abuse Commissioner's provider and commissioner survey data, officials across Government must bring together experts to consider the extent of current activity and learning from existing evaluations of services. This group should include academics, frontline practitioners, and be jointly coordinated by the domestic abuse sector representatives and children's sector representatives. Members of this group should be funded to work on this project.
- **Phase 2:** Following this phase, this same group should convene to consider lessons learned from previous evaluations and agree on the appropriate measures of evaluation, how to include children and young people's voices, principles of evaluation and if possible, a required dataset. These components must be decided by multiple people, to create a shared understanding. The voice of victims and survivors of abuse must inform the evaluation strategy and process.
- **Phase 3:** Once the above has been agreed by the parties listed above, services are evaluated. By laying the groundwork to ensure that evaluation principles are agreeable with localised, specialist domestic abuse support, the evaluation process would not be too onerous on services.

Funding should also be put aside for a Technical Assistance Fund. There are high levels of variability across the country when looking at the response to children subject to domestic abuse, but also pockets of excellent practice and expertise. The most efficient way for the Government to contribute to levelling the playing field would be to bring together experts from different organisations and fields, with different areas of expertise, to work together to build capability and capacity, dependent on local need.

Funding for specialist by and for services

The Commissioner's mapping report found that 67% of Black and minoritized ethnic (BME) survivors, 68% of LGBT+ survivors, 55% of disabled survivors, and 16 of 62 Deaf respondents wanted to access specialist support delivered 'by and for' by their communities – although most were unable to do so. 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 starkly reflected in the outcomes¹⁰ of these survivors - of the Black and marginalised survivors who accessed 'by and for' services, 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. Just 30% of Black and marginalised survivors who had not accessed any support felt safer than they had previously.

However, capacity within these services is a significant issue, with 'by and for' services often disadvantaged in their funding arrangements. The Commissioner's mapping report found these services were six times less likely to receive statutory funding than other specialist domestic abuse/VAWG organisations, and nearly twice as likely to have had to cease services due to lack of funding. A dedicated, ring-fenced 'by and for' funding pot would ensure there is provision of specialist services for everyone who wants it, enhancing provision and ensuring that the needs of all victims and survivors are met. It would increase the capacity of 'by and for' services to support marginalised communities and help to abolish the postcode lottery by commissioning 'by and for' organisations at a national level. It would help develop a sustainable market of 'by and for' organisations and build their capacity to improve the quality and quantity of their provision.

A multi-year funding pot would also allow for regular data collection and evidence gathering of what works best in supporting survivors most effectively. For this reason, we recommend mandatory monitoring, evaluation and reporting on a regular basis, i.e. at the end of each year of funding. This would also help organisations in building their case for continued/renewed/sustained funding after the multi-year funding period has passed.

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 inhouse. 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' services provides at risk of irreversible closure and loss of invaluable expertise.

Solutions

- In the upcoming Spending Review, the Government must provide ring-fenced funding for specialist 'by and for' support for black and minoritised, deaf and disabled, and LGBT+ survivors of at least £158.3 million for community-based and safe accommodation services. This will be critical to ensure that these highly specialist services are not outbid by more generic provides in the commissioning process
- As part of this ring fenced funding, the government should ensure that there is sufficient resource to help build capacity of these smaller specialist organisation and for regular data collection and evidence gathering of what works best in supporting survivors most effectively. For this reason, we recommend mandatory monitoring, evaluation and reporting on a regular basis, i.e. at the end of each year of funding. This will help organisations in building their case for sustained funding after the multi-year funding period has passed.
- The government should work closely with by and for organisations to help build their capacity to enable them to bid for work as part of a wider consortium.

Dedicated funding for accommodation based services

The Domestic Abuse Act (2021) placed accommodation-based services on a statutory footing and requires Tier 1 Local Authorities to provide safe accommodation for victims and survivors who need it. While a significant step forward, implementation varies and progress must be maintained and built upon. There remains a lack of local transparency about how funds are spent, and concerns raised by the domestic abuse sector about any removal of the current Section 31 grant arrangements which nominally protect this funding locally.

The Commissioner welcomes the Government's increased overall investment in the funding for the delivery of safe accommodation for survivors of domestic abuse for the year 2025/26 to £160 million. However, has recommended that annual spending on the duty should total £240.5 million, of which £70.1 million should be ringfenced for 'by and for' services, in order to commission the specialist refuge and by and for services which are proven to represent the best value for money with regards to supporting victims.

The Commissioner also remains concerned that the consolidation of this funding into the overall Local Government Settlement will result, without a ringfence, in a reduction in spending on specialist domestic abuse accommodation services. Women's Aid have reported that since the legal duty came into force, they have seen a growing number of

specialist domestic abuse refuges, being partly decommissioned, or forced to close entirely, due to the misapplication of public procurement and subsidy laws.

Furthermore, government spending on the Part 4 duty (as with many other areas of government spend on domestic abuse as outlined above) provides areas with very short notice of the amount of funding that will be available for them to commission local services.

Prior to the announcement made in December 2024 of funding for the year 2025/26 the Commissioner's Office received a significant volume of enquiries from specialist domestic abuse organisations and local commissioners regarding the timing of the announcement as there were significant concerns about the future of current contracts that were due to come to an end in March 2025. Following on from December's announcement, further time has then been required to allocate and commission services locally. As a result, it is most likely that frontline services will only receive confirmation about how much funding they will receive from the start of this financial year (2025/26) a month in advance.

From March 2025, Part 4 allocations will not be ringfenced but are provided within a 'thematic budget pot' to local authorities. Local authorities are still required to report detail of the spending to the MHCLG. The Ministry will also send out a memorandum of understanding to local authorities outlining details on what constitutes appropriate spending of the grant. The Commissioner understands that the memorandum of understanding was only issued to local authorities towards the end of February and therefore councils are likely making decisions that are not proportionate to its terms. Furthermore, whilst the MHCLG will be requesting and tracking data, they have no powers to scrutinise or claim back funding that's been spent inappropriately. There is no accountability mechanism in place to hold local government to account when they are not meeting the standards imposed by the duty and accompanying statutory guidance.

The Commissioner's Office have received reports from areas that due to the lack of notice and uncertainty from national government regarding allocations that funding for specialist organisations have either remained the same or decreased, even though the overall budget has increased. As a result, the Commissioner's Office have heard examples of specialist organisations who have had to fundraise, use reserves or close elements of their services in order to continue.

MHCLG have commissioned Ipsos/ECORYS to conduct a review of the duty which is expected to be published in Spring. The report focused on in-depth case studies across 19 areas, in 2024. Local authorities have had the opportunity to agree/decline participation in the evaluation therefore making it a self-selecting group. This casts doubts over the findings as poor performing local authorities would likely not want to be involved in this level of scrutiny.

Case study provided to the Commissioner by a domestic abuse charity.

A specialist domestic abuse service was providing a refuge in an outer London borough under a contract expiring in March 2025. In January 2025, the borough commissioners were informed that the service was at risk of being decommissioned as they were unsure whether they would have any budget for domestic abuse accommodation in 2025/26. The domestic abuse service made the case to keep the refuge, but at the same time had to prepare for closure, including creating budgets and action plans for terminating the lease for the building and making all refuge staff redundant.

The borough had been allocated administrative costs only under the Part 4 Domestic Abuse Act 2021 duty as a Tier 2 local authority, with the bulk of funding going to MOPAC as the Tier 1 authority. Key staff in the outer borough had misunderstood how the duty under the Act operated and thought that the small allocation for admin costs was their budget for

domestic abuse accommodation. This was complicated by the fact that the borough was not able to access significant funds from MOPAC, as they had not understood that they needed to apply for this in 2022 when funding for the duty commenced.

Commissioners tried to access funds from their own local authority to continue the service, but there was significant resistance. In February 2025, the tier 2 local authority allocated a small amount of funding for the refuge, and received a strong indication that MOPAC would be able to provide some funding towards the service as well. The service provider has also been able to allocate some of its own funds towards the service to keep the refuge open for one more year.

While it is positive news that the refuge may now stay open, this case study demonstrates how precarious this service is. Significant work from the specialist provider and borough commissioners went into ensuring that the service was able to remain open for a further 12 months, drawing resource and capacity away from frontline delivery, which has been an inefficient use of resources. This case study also highlights the difficulties faced by organisations in retaining staff when there is lack of clarity about the length of their employment beyond the next couple of months.

It also shows how additional funds for domestic abuse safe accommodation are being spent in a dysfunctional way in some areas, particularly those in which Tier 1 authorities receive funds, but Tier 2 authorities commission services. In practice, welcome additional funding from central government for domestic abuse safe accommodation, is not always leading to increased services for domestic abuse survivors in some areas. Instead, Tier 2 authorities have often withdrawn or reduced their own budgets for these services but cannot always access the Tier 1 funding to keep them going.

Solutions

- As outlined in the Commissioner's Spending Review Submission, the Government should invest in £240.5m per annum for Safe accommodation funding to meet Part 4 of the Domestic Abuse Act, of which £70.1m should be ringfenced for 'by and for' services.
- In light of reports from local areas, allocations to local authorities should remain ringfenced to avoid funds being subsumed into general budgets and directed away from specialist services.
- The MHCLG should commit to a full-scale evaluation of the duty, which should include a full data return from every council outlining demographic details of households provided assisted under the duty, the services which are being commissioned and long-term outcomes for survivors. The evaluation should provide a detailed analysis of the impact of the ringfence in 2025/26.