



Government Equalities Office
**Consultation on a Strategic Action Plan for the Sustainability
of the Violence Against Women and Girls Third Sector**
July 2010

About Refuge

Refuge is the single largest provider of specialist domestic violence services in the country and has nearly 40 years experience supporting abused women and their children. On any one day, Refuge supports around 1,500 women and children across our domestic violence services which now include:

- **Freephone 24 Hour National Domestic Violence Helpline (0808 2000 247):** Run in partnership between Refuge and Women's Aid, the Helpline provides support to 400 women on a daily basis and acts as the national gateway to accessing domestic violence services across the country
- **Refuge accommodation:** Refuge runs 45 refuges across 18 local authority areas. In total these refuges support almost 600 women and children. They include culturally specific refuges for South Asian and African-Caribbean women
- **Floating support:** Refuge supports over 200 women and children through this service which works with women who are either still living with the abuser and/or those who have left the abuser and who require support
- **Community outreach scheme:** Refuge reaches out and provides support to women from ethnic minority groups through this scheme, including Vietnamese and East European women from Bulgaria, Poland and Romania
- **Psychological services:** Refuge's specialist psychologists and social workers work with women and children to help them address the immediate, short and long-term impacts that domestic violence has had on their lives and their relationship with each other
- **Independent advocacy:** Refuge's independent domestic violence advocates operate across London, Kent and Warwickshire. At any given time, each Independent Domestic Violence Advocate (IDVA) has the capacity to support a caseload of 25 women for an average of three months, each supporting around 100 women per annum
- **Prevention and education:** Refuge works to influence the Government's response to domestic violence and raises public awareness about domestic violence through award-winning pro bono campaigns and a 24 hour proactive fast-response press office

Introduction

Refuge welcomes the consultation on a Strategic Action Plan for the Sustainability of the Violence Against Women and Girls Third Sector. We are delighted to hear that the new Coalition Government continues to recognise the value of a coherent approach to tackling violence against women. Refuge looks forward to contributing its own expertise to the development of the new strategy.

When reviewing the Labour Government's Violence Against Women and Girls strategy, Refuge considers that its biggest weakness is the lack of funding for services attached to it. Whilst Refuge appreciates that action must be taken to reduce the deficit, Refuge agrees with Theresa May MP, the new Home Secretary and Minister for Women when she recently acknowledged that *'even in these financially constrained times, there are some things that are too important not to do'*.

There is strong evidence to demonstrate that addressing the issue of violence against women is cost effective. Indeed research has shown how investment in services to reduce domestic violence has been cost effective for the country as a whole, reducing the cost of domestic violence to the state from around £23 billion in 2004 to about £16 billion in 2009.

There can be no doubt that there is a strong spend to save argument for providing domestic violence services and Refuge is working to produce evidence of the cost savings which arise from running its own domestic violence services for the Comprehensive Spending Review.

As such, we urge the new Lib-Con Coalition Government to respond to the findings of this consultation exercise and to ensure that this draft Strategic Plan is developed into a fully funded and comprehensive national strategy which reflects the 3 'P's of service provision, protection and prevention and which holds local authorities to account.

Response to consultation questions

1. Do you or your organisation think that the three themes of cash, commissioning and capacity building set out in the Strategic Action Plan are the right ones?

Refuge agrees that the three themes set out in the Strategic Action Plan are correct and that they provide a useful analytical framework. However, because these issues intersect and operate within the current political and funding environment, Refuge would warn against concentrating only on these three issues in isolation and without considering pressures on both national and local government.

An additional 'c' to reflect the need to communicate and create awareness about violence against women is also very important – for example, internal communication between Government departments; communication between central and local government; communication between government and the women's sector; and communication between specialist providers of domestic violence services and the women and children who use them.

2. In terms of the proposed actions set out under the 'cash' theme (actions 1.1 and 1.2), do you or your organisation consider these will help support sustainability of the violence against women and girls (VAWG) third sector?

Clarification on the role of central Government funding to the VAWG third sector is vital to the

sustainability of the sector. This matter needs immediate attention as recent trends in relation to decisions being made by local authorities around Supporting People funding and housing benefit (which together form almost all of Refuge's funding) mean that Refuge's refuge services are under very real threat of being scaled back or lost altogether. The Minister for Women stated in her maiden speech on violence against women that *local authorities must not see this sector as an 'easy touch' when making difficult decisions*. Yet Refuge is unhappy to report that this is already happening. As outlined, below some of Refuge's local services have already been identified for funding cuts and Refuge is aware of cuts in funding having taken place – for example, in the Isle of Wight and Gloucester.

To lose what refuge provision already exists would have disastrous consequences for national levels of refuge provision which we know are inadequate since demand for refuge space continues to far exceed supply. Nearly one third of local authorities provide no specialist domestic violence services at all and women and children continue to face a postcode lottery in accessing the support they need.

Supporting People Programme

As the single largest provider of domestic violence services in the country, Refuge is able to determine trends in relation to funding decisions undertaken by local authorities very quickly. East Sussex County Council informed Refuge on 13 July 2010 that it is looking to reduce its refuge provision which is funded by the Supporting People Programme. It is making this decision on the basis of local need, arguing that in 2008/09 more than two-thirds of refuge spaces were taken by women from outside of East Sussex.

On the 19 July 2010, Refuge received a request from the Supporting People Team in Lewisham asking how many women in our refuges are from outside of the borough. This request was made by the Supporting People Team as a consequence of an e-mail sent to all Supporting People teams from a Supporting People Commissioner at Warwickshire County Council. The Council had heard that other local authorities are limiting the number of refuge spaces that can be provided to women living outside of the commissioning local authority area. Warwickshire County Council was therefore keen to hear from local authorities that had considered this route and what issues had informed their decision making around it.

What these discussions demonstrate is a complete lack of understanding about refuge provision. Women and children escaping domestic violence by entering into refuge are at too high a risk to remain in the local area and we would *expect* women and children in refuge accommodation to come from outside the area. Refuges commissioned at a local level are therefore part of a network of refuge services across the country, which are accessed via the National Domestic Violence Helpline which Refuge runs in partnership with Women's Aid.

The unique position of refuge accommodation was acknowledged by the previous administration when the Supporting People regime was implemented and a 'ring fence' was introduced to ensure that central Government retained the ability to oversee proposed changes in national provision. Under the ring fence, the approval of the Secretary of State for Communities and Local Government was needed for a council to de-commission refuges or reduce bed spaces, ensuring that any such proposals received national rather than purely local consideration.

However, the removal of the ring fenced funding around domestic violence services from March 2010 means that individual local authorities can now make decisions on how to spend their

Supporting People budgets. It also means that the scrutiny provided by the Secretary of State no longer exists.

Although East Sussex County Council recognises the impact that reducing the number of refuge spaces at the local level will have nationally, the current financial climate and the cuts that the Council is under pressure to make means that it believes it has no choice but to reduce the refuge provision in the face of competing local need. The Council argues that it is unfair that it should have to provide refuge space for women outside the local area when no formal reciprocal agreement exists between local authorities across the country.

Whilst Commissioners at East Sussex County Council have suggested that this issue may be overcome by accommodating women and children in sanctuary schemes with a specialist floating support service, the approach it is suggesting is dangerous. The Supporting People Programme classifies refuge provision as low level support yet, as noted above, the majority of women and children who go into refuge accommodation are at high risk of homicide.

As a specialist provider of domestic violence services, Refuge has developed a unique electronic casework system which captures the levels of risk women face. In East Sussex, for instance, 80 per cent of the women who entered our refuge services in FY09-10 were trying to separate from their abuser – the point at which women are at highest risk of homicide. In addition, over 50 per cent of the women who entered the service reported that their perpetrator had **threatened them with a weapon**, over 50 per cent of women reported that their perpetrator had **tried to strangle them** and nearly 70 per cent of women reported that their perpetrator had **threatened to kill** them.

Refuge urges the Government to re-introduce the safeguard that requires the Secretary of State for Communities and Local Government to consider any plans to de-commission refuges or reduce bed spaces as a matter of priority.

Housing benefit

Another trend that Refuge has noted is that housing benefit departments are strictly interpreting exempt status under sub-paragraph 4(10) of Schedule 3 to the Housing Benefit and Council Tax Benefit Regulations (2006).

The original aim of introducing exempt status was to ensure that the higher rent levels of organisations providing specialist supported accommodation could be met and not subject to regulations which cap rents at rent officer determination level.

Whilst organisations such as Refuge have been successfully claiming exempt status from rent restrictions for a number of years, local authorities looking to reduce their housing benefit costs are interpreting the exempt clause so that domestic violence specialists such as Refuge no longer fall within it. Local authorities are insisting that the exempt clause can only be used by those providing specialist supported accommodation if they are both the landlord of the accommodation as well as the provider of the care and support to the people who live in it.

This strict interpretation excludes most providers of specialist domestic violence services since it is rare for refuges to own the building or lease from which they provide services. This means that Refuge and other specialist providers who rely on housing benefit alongside Supporting People money will be unable to tender for future refuge services and may be unable to sustain those they already have since it will be economically non-viable to do so. Being outside of the

exempt clause and subject to rent cap will reduce our income from housing benefit by half.

Refuge urges the Government to stop pursuing mutually exclusive agendas to the detriment of the refuge movement and women and children escaping domestic violence. Therefore we recommend that the Government provides specialist providers of domestic violence services with parity by amending the regulation so that we have the same status as housing associations.

National funding plan

In addition to seeking action from central Government in relation to Supporting People and housing benefit, Refuge urges the Government to provide more detail on: how much 'cash' it proposes to invest in violence against women services at national level; which Government departments would contribute to a single funding stream; and how this money would be distributed across the violence against women and girls sector.

Refuge has long called for a fully funded national strategy which would address the current postcode lottery in domestic violence services and ensure that funding is available for a range of domestic violence services.

Funding for children

Refuge has also been calling for a specific funding stream for children to be put in place since children make up two-thirds of refuge residents and are some of the most deprived and vulnerable children in the country. In this respect, Refuge was reassured to hear the Minister of Women's response to a question following her maiden speech on violence against women and girls when she acknowledged that no previous Government has focused sufficiently on children impacted by domestic violence. We welcome this and look forward to seeing future plans and funding to address this matter.

Importance of specialism

Finally, the Strategic Plan does not provide clarification on what is meant by the term VAWG third sector – does this refer only to specialist women's organisations or does it incorporate housing associations and providers of generic services to men and women? Refuge's response to 'Mainstreaming the Commissioning of Local Services to Address Violence Against Women and Girls' in March 2010 highlights the importance of commissioning specialist domestic violence services rather than generic services by non-specialists.

The benefits of specialist domestic violence services include:

- Women-only services: one of the key findings of focus groups undertaken with 300 women as part of the VAWG strategy consultation was that women most value women-only specialist support services
- The ability of specialist domestic violence providers to reach the most marginalised women and children: women prefer to access specialist services outside of the statutory sector because of their independence - this is crucial for women who have fears in relation to social services and contact with agencies interested in their immigration status
- The provision of a 'basket' of services: many specialist service providers undertake fundraising activities to provide additional services that are not funded through statutory

sources – for example, services for children who make up two-thirds of those staying in refuge accommodation and psychological services for women and children

- Institutional advocacy: many specialist service providers undertake awareness raising activities at a local, regional and national level which also includes providing free training to statutory agencies, teaching young people about violence against women in schools as well as working alone and in coalition to influence legislation and policy in this area
- Added value: by providing the basket of services outlined above and responding to women and children at the point of crisis, specialist responses to violence against women have a positive impact on long term costs in relation to education, employment, social cohesion, health and housing. The work of specialist domestic violence service providers therefore has a direct and positive impact on the local authority spending and their ability to meet statutory obligations.

A piece of work has already been undertaken by Capgemini in 2008 for the Department of Communities and Local Government which looked at what the financial impact would be if Supporting People funded services were replaced by the most appropriate positive alternatives for meeting different group's needs. The research found that investment in packages of housing related support services avoids higher costs elsewhere and so produces a net financial benefit – for every £1 of Supporting People money spent, there is a net gain of £1.78. The costs of supporting an individual through Supporting People are therefore lower than the overall costs of withdrawing or reducing that support. Indeed the removal of Supporting People services would lead to increased costs in the areas of: health, homelessness, tenancy failure and crime.

Furthermore, the Capgemini research shows that, in terms of net benefit per individual, there is particular value for money by providing services for those fleeing domestic violence. The cost per 1,000 units of support for women at risk of domestic violence is £10.1 million whilst the net financial benefit of providing that support is £14.6 million. This suggests that local authorities should treat women fleeing domestic violence as a higher local priority for a) increasing service provision where resources are available b) protecting service provision when resources are constrained.

Refuge is building on the Capgemini research to develop a piece of work which will demonstrate the cost-benefits of specialist domestic violence support vis-à-vis generic provision and we look forward to sharing its findings with central and local Government.

3. Which of the actions listed under the cash heading is, in your or your organisation's view, the most important to sustainability of the VAWG third sector?

As noted above, the most important action that central Government can undertake is providing clarification of what funding will be available for specialist domestic violence services and from where the funding will come.

Ideally this information will be presented in the context of a fully funded national strategy for service provision which addresses the current postcode lottery in domestic violence services, ensures that funding is available for a range of domestic violence services and provides funding specifically for children's services.

This strategy should be owned across government with financial contributions from all government departments. Since refuge provision is a national as well as a local resource, the strategy should clearly state what is expected of local authorities and contain targets which they are obliged to meet.

4. Which of the individual actions listed under the cash heading is, in your or your organisation's view, the least likely to result in improved sustainability of the VAWG third sector?

Again, as noted above, there needs to be an overarching national funding strategy which sets out the specific responsibilities of national and local Government across the full spectrum of specialist VAWG services.

The cost-benefits of providing specialist domestic violence services must be recognised at national and local level so that national and local governments do not seek to cut money from the Supporting People Programme budget.

5. Do you or your organisation welcome the proposal under action 1.1 in the plan – to combine existing central Government funds, where appropriate, which support the VAWG sector?

Refuge welcomes the proposal to combine central Government funding streams into 'one pot' in principle, since this would reflect the cross-cutting nature of violence against women and the need for all Government departments to work together within a strategic framework to ensure the best outcomes for women and their children.

However, as already noted, we would want this single funding pot to be attached to a comprehensive national strategy for service provision with financial contributions from all government departments. Refuge also advocates that 'cash' is distributed directly to frontline service providers rather than given to umbrella organisations to distribute.

6. Please outline how you or your organisation would use the information on good practice in match funding of projects by local and central Government, we are suggesting should be combined under action 1.2 in the plan, to help develop a more sustainable VAWG third sector.

The proposed development of links between central and local Government for seed-funding and pilot projects as well as match funding outlined in the Strategic Plan has limited usefulness if local authorities do not have or will not commit the resources to fund such initiatives on an ongoing basis.

It is Refuge's experience that local partners recognise the value of developments such as Independent Domestic Violence Advocates but cannot contribute to their ongoing funding. This situation will be exacerbated by the current financial climate and cuts that local authorities need to identify. As a consequence of this, services end up collapsing and women and children are left without specialist support.

Refuge therefore urges national and local government to channel any additional 'cash' that might be forthcoming at national level into the services which already exist and which are proven to provide effective responses to violence against women and their children. Once

more, Refuge believes that this should be in the context of full-funded national strategy for service provision.

7. In terms of the proposed actions (2.1 through to 2.5) set out under the 'commissioning' theme, do you or your organisation consider these will help support sustainability of the violence against women and girls (VAWG) third sector?

Refuge welcomes recognition that commissioning processes need to be improved, but is disappointed by the way in which the proposed actions are framed i.e. 2.1 - '*encourage* funders and commissioners to *consider* engaging with VAWG third sector providers where *appropriate*'.

Refuge has made its views on the problems with the current system of commissioning very clear in its response to the consultation 'Mainstreaming the Commissioning of Local Services to Address Violence against Women and Girls' which it submitted in March 2010. In particular, Refuge raised two concerns about competitive tendering:

1. The competitive tendering *process*
2. The *criteria* used by commissioners to select service providers

The competitive tendering process

Refuge strongly believes that women and children experiencing domestic violence deserve the best support possible and we appreciate that the tendering process has been designed to achieve this. Yet the 'typical' tendering process is incredibly resource and time intensive and involves:

- Completing an Expression of Interest
- Completing a Pre-Qualification Questionnaire (PQQ)
- Responding to an Invitation to Tender (ITT)
- Post Tender Award Clarification
- Implementation

In order to ensure that Refuge staff members are able to fully concentrate on providing support to the women and children using Refuge's services, Refuge has had to secure core funding to employ a Development Team to oversee the tendering process. This team is made up of three individuals who work full-time on re-tendering for existing services as well as tendering for new services. But few other specialist domestic violence providers have the resources to do this.

Commissioners of services do not typically follow a standard or common format for each of the stages outlined above. For example, the background information and instructions for the most intensive stage, responding to an ITT, can range from 80-150 pages. There are also varying timescales for completing ITTs which are often unrealistic.

An ITT for domestic violence accommodation that Refuge recently responded to only gave bidders 28 days to source 30 units of accommodation, complete extremely complicated staff TUPE information, undertake financial modeling and assess the financial risk of taking on the project. Furthermore we were expected to do this without being provided with information about exactly what we would be taking on – for example, what the legal relationships with the housing association landlords were.

When we do formally request questions asking for more information, these questions rarely get answered. As a consequence it is extremely hard to adequately manage the serious risks which may arise. It is also difficult and very expensive to get legal advice about issues such as TUPE when we have none of the information we have sought. Another difficulty and a serious financial risk is getting the local authority to indicate the level of housing benefit that they are willing to pay. In some cases, the local authority is obsessively concerned with the level of subsidy they will get from central Government.

Furthermore, because commissioners are still relatively new to commissioning domestic violence services they do not always have sufficient expertise and understanding to design appropriate service specifications. Refuge has been invited to bid for a range of services where it has been clear that the commissioners did not understand the nature of the service. Examples include: being asked to run refuge accommodation where there would be unpaid male role models on the site; being required to supervise women in refuge accommodation during their evening meal; and providing an advocacy service that was essentially the provision of long term counselling. Sometimes it is not even clear what the service out for tender is (refuge accommodation or floating support), or where it is based.

Very few local authorities are flexible about the service specification or allow specialist providers such as Refuge to provide feedback or submit a qualified tender through which new ideas can be put forward. This stunts innovation in the delivery of domestic violence services and ultimately means that ineffective and sometimes dangerous services are commissioned. Because of this, Refuge has decided not to tender for domestic violence services on a number of occasions since the specialist needs of women and children have been subsumed within generic service provision.

Another area where commissioners lack understanding is around the Gender Equality Duty which is often interpreted to mean gender neutral services. This means that local authorities have been increasingly asking specialist organisations such as Refuge to provide the same services for women and men. This does not take into consideration: the different experiences that women and men have in relation to experiencing violence; the different needs that women and men have as a consequence of experiencing violence; and the different services that are needed to respond appropriately to women and men. For instance, particular screening processes need to be out in place when male victims of domestic violence present to professionals since a significant percentage of male victims are also perpetrators of domestic violence.

Refuge is the largest single provider of specialist domestic violence services for women and children and has secured funding for a dedicated Development Team. Yet even we struggle to operate within the commissioning context outlined above. With any number of Refuge's services up for re-tender at any one time, the organisation's income and the job security of staff members is always uncertain.

Criteria used to select service providers

Refuge understands that the commissioning process is still relatively new to local authorities and that it can take time to develop the knowledge and skills needed to develop appropriate criteria for selecting service providers. However, the nature of violence against women means that a lack of knowledge about the issue can translate into potentially dangerous outcomes for women and children.

For instance, the provision of services at low unit cost does not always equate to providing an effective service. Indeed, research undertaken by the Women's Resource Centre (2007) found that victims of domestic violence were more likely to return to their perpetrator if they were supported by a service with lower than average unit costs.

Yet Refuge is aware of organisations which have been awarded contracts on this basis. The successful bidders in these cases are often large providers such as housing associations who are able to spread their management costs across their services. In addition, housing associations often have their own properties and so are at an advantage not only in relation to the 'exempt clause' outlined above, but also when the service provider has to source a property within the time scale given.

The outcome of this is that it is now common for large housing associations with no experience of supporting victims of domestic violence to be awarded contracts. Refuge is not saying that housing associations should be excluded from the tendering process, but we do have serious concerns about the quality of support that the current commissioning process is producing. In fact Refuge has been approached by housing associations desperately seeking help and advice on the key principles for safe delivery of domestic violence services after they have been awarded a contract.

In addition to the concerns that Refuge has already raised about inappropriate service specifications, in some cases it also appears that the service specification has been written with a specific service provider in mind. Refuge's experience suggests that service specifications are becoming increasingly prescriptive so that, to be in a position to bid, the service provider must be able to provide a certain number of properties, a certain number of bed spaces and certain types of facilities, such as en suite bathrooms.

Again, it is Refuge's view that specifications like this immediately put specialist domestic violence providers at a disadvantage since they are unlikely to have an asset base which includes properties. In order to bid for tenders it means that organisations such as Refuge then have to spend time and resources 'sourcing' properties.

Even when working with housing associations, there are constraints in respect of new build properties with the expectation that there must be alternative use built into the design. A recent example is a refuge that is being built with self contained single bedroom units. This design does not take into account the needs of women and their children. The nature of the design also means that when Refuge comes to run the property we will have to administer an Assured Short Hold tenancy.

Until recently, the normal tenure given to our residents has been an excluded licence agreement. This type of tenure provides a number of safeguards to Refuge as an organisation, allowing us to immediately remove a woman (who, for example, may have extreme mental health problems) to a more appropriate project or refer her back to the Local Authority Homeless Unit.

The excluded licence agreement also provides Refuge with an element of flexibility, allowing us to make maximum use of refuge space. Women and children fleeing domestic violence often arrive late at night and usually with only the clothes that they are wearing. Due to the national shortage of refuge spaces, it can sometimes be the case that a single woman is placed in a family room. However when a single room becomes available Refuge will typically ask her to

move, thus ensuring that there is space for a woman fleeing with children.

However new-build accommodation as well as the remodelling of existing refuge accommodation has resulted in a movement towards self-contained accommodation with common areas being confined to communal lounge, children's room and garden. This means that residents are issued with an Assured Short Hold tenancy. Whilst Refuge recognises that Assured Short Hold tenancies have advantages for the tenant compared with excluded licences, the short term nature of refuges means that they are unsuitable for a number of reasons.

To begin with, although self-contained accommodation is similarly flexible to single and family rooms (i.e. studio flat /1x2 bedroom units and special units for women with disabilities), Refuge is unable to move a service user with this type of tenure to another unit within the refuge without her permission. Since women will be placed in the accommodation that is available on their arrival, this may mean that a larger unit is given to a single woman who may be unwilling to move if a single unit becomes available. As a consequence, this situation then blocks up accommodation suitable for a family in crisis.

In addition, part of the ethos of a refuge is the shared experience of women and the potential for mutual support. The ability of residents to isolate themselves in contained accommodation on an Assured Short Hold tenancy mitigates this. Moreover, because a number of residents experience multiple problems they will require, at least initially, intensive support. The ability to shut themselves away in contained accommodation can be dangerous both for them, their children and the refuge as a whole, allowing them to evade the terms of the Supporting People contract (to have and co-operate with a key worker). This makes it difficult for Refuge's staff to monitor areas of concern such as self harm or the well-being of children. Furthermore, in those rare cases where a resident's behaviour is dangerous to other residents it is a lengthy and expensive process to get a court order to evict. As a consequence of this Refuge has had to move all the other women and children out of a refuge on at least two occasions to protect them from harm.

Although Refuge welcomes plans outlined in the Strategic Plan to increase knowledge and ability, and in some cases, capability of commissioners to understand and support the VAWG third sector, our experience is that this will not translate into specialist organisations being able to compete on a level playing field with larger non-specialist and generic providers. Nor will it address the financial pressures that commissioners are subject to.

8. Which of the actions listed under the commissioning heading is, in your or your organisation's view, the most important to sustainability of the VAWG third sector?

None of the actions listed under the commissioning heading can be successful unless action is taken to address the points which Refuge has raised above.

9. Which of the individual actions listed under the commissioning heading is, in your or your organisation's view, the least likely to result in improved sustainability of the VAWG third sector?

The actions listed under the commissioning heading are useful but need to be addressed alongside the challenges Refuge has already highlighted in its answer to question number seven.

There has already been a cut of £30 million to the Supporting People administration grant which is alarming enough. Refuge, alongside other organisations providing supported housing, is now increasingly concerned about how October's Comprehensive Spending Review will impact the remainder of the Supporting People budget.

10. In terms of the proposed actions set out under the 'capacity building' theme (actions 3.1 through to 3.4), do you or your organisation consider these will help support sustainability of the violence against women and girls (VAWG) third sector?

As the single largest provider of domestic violence services in the country, Refuge has been able to develop a Head Office function and Council of Management structure – both of which provide a strong centre from which to support our services at local level.

We are able to provide senior operational management as well as development, finance, fundraising, HR, IT, policy and communication functions across all the services that we run. In so doing, Head Office is able to provide added value to our services at the local level and increase the impact that they are able to have in the local area. It is Refuge's wide range of services coupled with a strong infrastructure and 40 years of specialist expertise which allows us to do this and to feed into work nationally – for example, the development of national occupational standards for the domestic and sexual violence sector.

However small providers, often with a long history of development find it increasingly difficult to attract and retain committee/board members.

11. Which of the actions listed under the capacity building heading is, in your or your organisation's view, the most important to sustainability of the VAWG third sector?

Refuge believes that streamlining consultation with the VAWG third sector would avoid consultation burdens and duplication for groups and individual organisations. As such, Refuge is very concerned about the future of the Women's National Commission (WNC) which is currently under review. This is especially the case for small groups since, without the WNC, their voices would not be heard at national level.

12. Which of the individual actions listed under the capacity building heading is, in your or your organisation's view, the least likely to result in improved sustainability of the VAWG third sector?

The suggestions in relation to: funding work with VAWG umbrella organisations to provide advice on areas such as management and governance; encouraging VAWG organisations to share backroom facilities; and encouraging the use of trustees with a business background may be useful for smaller organisations.

In recognition of the challenges identified by the Strategic Plan and solutions suggested under this heading it is also important to highlight that some local providers have responded by merging together.

Other specialist providers, for example Tower Hamlet's Women's Aid (now part of Refuge) have approached Refuge asking to be taken over by the organisation. Such action is motivated specifically to protect specialist domestic violence services from being subsumed by generic

service providers.

13. Do you or your organisation agree with the proposal under action 3.1 in the plan that Government Equalities Office should work closely with the Women's National Commission to enable the voice of the VAWG third sector to be fed into government in order to avoid consultation burdens and duplication for groups?

As noted under question 10 above, the future of the WNC is currently uncertain. Refuge believes that the loss of the WNC would undermine the Strategic Plan's objective of strengthening the capacity of national VAWG third sector groups to engage with decision makers, commissioners and funders and avoid consultation burdens and duplication for groups.

For larger organisations such as Refuge which has: a national voice; nearly 40 years experience of providing domestic violence services; and is the largest provider of specialist domestic violence services, it is also important that the Government continues to engage with key organisations vis-à-vis the Advisory Groups that were set up across Government Departments in the run up to the Violence Against Women and Girls Strategy. These groups continue to be very valuable and Refuge is able to bring its vast experience of running services as well as the voices of the thousands of women and children we support on a daily basis to the table for discussion and consideration.

14. If appropriate, would your organisation be willing to be involved in the proposed project, under action 3.4 in the plan, to encourage volunteering by trustees with a business background in the VAWG third sector?

Refuge has a Council of Management which is already made up of individuals with varied backgrounds, including business. At the same time, a number of Refuge's specialist staff members have MBAs and professional qualifications/backgrounds in business. We believe it is important to have Council Members with a variety of skills who can contribute to our decision making.

Refuge would be happy to be contacted if the Government is interested in exploring this further.

15. If you answered YES to the previous question, do you give permission for Government Equalities Office to contact your organisation about this using the email address you gave earlier in the survey.

Yes

16. In terms of the proposed actions set out under the 'general' theme (actions 4.1 through to 4.4), do you or your organisation consider these will help support sustainability of the violence against women and girls (VAWG) third sector?

Enforcement of the Compact and Equality Duties would be helpful in relation to ensuring that appropriate violence against women and girls services are put out to tender. It is currently very unusual for local authorities to undertake a gender and race impact assessment before commissioning services and Refuge believes that this needs to be challenged.

17. Which of the actions listed under the general heading is, in your or your organisation's view, the most important to sustainability of the VAWG third sector?

The most important action listed under the general heading is consultation with the VAWG sector organisations. The views and experiences of the sector should be seen as a crucial element in developing this work further.

18. Which of the individual actions listed under the general heading is, in your or your organisation's view, the least likely to result in improved sustainability of the VAWG third sector?

Refuge questions the need for further research into the sustainability of the sector. We are clear what support the sector needs and look forward to Government addressing the issues we have raised.

19. Which of the equalities characteristics listed under action 4.4 in the plan, in your or your organisation's view, are the most important in terms of sustainability of the VAWG third sector?

All of the equality characteristics listed under action 4.4 are important in terms of the sustainability of the VAWG sector. There needs to be a response in place for every woman no matter what her background, race or disability.

20. Do you or your organisation think as mentioned under action 4.4 in the plan there are geographic issues that need to be taken into account when working on the sustainability of VAWG third sector?

The consultation states that one of the purposes of the Strategic Action Plan is to work towards the delivery of VAWG service provision in local areas that is appropriate to local needs. However Refuge strongly challenges this. Overall levels of violence against women and girls are not sensitive to changes in demographics and space.

Refuge recommends that the Action Plan simply states that every local authority must make provision for the needs of women and girls experiencing violence.

As consistently noted throughout our response, Refuge has long advocated for a national strategy on domestic violence service provision. We remain disappointed that almost one third of local authorities still do not provide specialist domestic violence services. Not only does this result in a postcode lottery for women and children who need services, but it provides an excuse for local authorities to cut their own refuge provision. In order to convince local authorities of the necessity of giving refuge space to women fleeing domestic violence from outside the local area, then the areas from which they are fleeing also need to provide reciprocal provision. There is a clear need for the Government to make this case since refuge provision is unique in its 'national' nature with women and children having to flee across boundaries in order to remain safe.

21. Please state briefly any other issues that you or your organisation think need to be taken into account in terms of the sustainability of the VAWG third sector?

Refuge has long advocated for a national strategy on domestic violence service provision so

that the UK meets the 1975 Select Committee recommendation of refuge space per 10,000 of the population; a requirement which was recently reinforced by the Council of Europe when it urged Governments across Europe to be mindful of minimum standards on the geographic availability of third sector specialised support services. We hope very much that the Strategic Action Plan provides an opportunity for such a strategy which is comprehensive in approach, recognising the additional 'c' of communication.

Whilst we recognise that the current economic climate provides a challenging environment within which to consider additional investment, there is strong evidence to demonstrate that tackling the issue of violence against women is cost effective. As already highlighted, Refuge will be contributing its own research into the cost savings of specialist provision during the Comprehensive Spending Review.

22. Would you or your organisation be willing to be contacted after the consultation is complete to discuss your response(s)?

Yes

23. If you answered YES to the previous question, do you give permission for Government Equalities Office to contact your organisation about this using the email address you gave earlier in the survey?

Yes