



# **Briefing**

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

June 2010

Understanding and supporting  
women and their organisations

This document is available in other formats. Contact the Women's Resource Centre on 020 7324 3030 or [info@wrc.org.uk](mailto:info@wrc.org.uk)

The Women's Resource Centre is supported by



## **About the Women's Resource Centre**

WRC is a charity which supports women's organisations to be more effective and sustainable. We provide training, information, resources and one-to-one support on a range of organisational development issues. We also lobby decision makers on behalf of the women's not-for-profit sector for improved representation and funding.

Our members work in a wide range of fields including health, violence against women, employment, education, rights and equality, the criminal justice system and the environment. They deliver services to and campaign on behalf of some of the most marginalised communities of women.

There are over ten thousand people working or volunteering for our members who support almost half a million individuals each year.

For more information about this briefing, contact:

Rebecca Veazey  
Policy Officer  
Email: [rebecca@wrc.org.uk](mailto:rebecca@wrc.org.uk)  
Tel: 020 7324 3046

Women's Resource Centre  
Ground Floor East, 33-41 Dallington Street  
London EC1V 0BB  
[www.wrc.org.uk](http://www.wrc.org.uk)

## Introduction

The Government Equalities Office (GEO) is currently consulting on its Strategic Action Plan which looks at the role of the government in supporting the sustainability of the violence against women and girls (VAWG) sector.

This work follows on from the cross-government report 'Together We Can End Violence Against Women and Girls Strategy' and is an important opportunity to provide input on policy regarding future funding for the women's voluntary sector.

The consultation will close on **Friday 23<sup>rd</sup> July 2010** and can be responded to through an online survey available at the following link:

<http://www.surveymonkey.com/s.aspx?sm=eHT6cvlJw%2fBi9RBOAZkETw%3d%3d>

Please visit the GEO website for further information:

<http://www.equalities.gov.uk/default.aspx?page=1600>

If you would like to feed into WRC's response please contact [rebecca@wrc.org.uk](mailto:rebecca@wrc.org.uk) **by Wednesday 7<sup>th</sup> July 2010**, and if you submit your own response please also send us a copy.

WRC have prepared this briefing to summarise the document's proposals and highlight the aspects which may be the most relevant to your organisation. This briefing aims to inform you of the key issues and ideas you may wish to include in your response and summarises the key points contained within the Strategic Action Plan.

## Overall objectives

The purpose of the Strategic Action Plan is to work towards the delivery of:

- VAWG service provision in local areas that is appropriate to local needs.
- Increased recognition nationally and locally of the role and value of the VAWG third sector in the delivery of direct services and in providing informing, advocating and influencing as well as working in partnership with others.
- Increased clarity within local statutory bodies about which body is responsible for leading on provision of, and funding for, specific VAWG services.
- Appropriate local funding arrangements for VAWG third sector services.
- Local commissioning processes which are straightforward, transparent and inclusive of the VAWG third sector.
- Increased clarity on how local bodies' performance on the provision of VAWG services will be measured and monitored.

- An increase in the organisational capacity of VAWG third sector groups to maintain internal stability and resilience; and
- A single agreed performance framework/quality standard which VAWG third sector groups work to and which is recognised by government.

The document is divided into three key areas: cash, commissioning and capacity building and as such we have structured our briefing according to these central themes.

### **Overall comments**

We welcome the GEO's commitment to the sustainability of the VAWG third sector and their plans to encourage diversity of provision through local commissioning processes to meet the diverse needs of service users. In addition, we appreciate their efforts to enhance the capacity of the VAWG third sector and their intention of developing greater links between central and local government on this issue. We fully support the GEO's plans to educate commissioners on the value of third sector VAWG organisations and encourage them to engage with these groups to enable the provision of services most appropriate to survivors needs.

We are deeply concerned that the action plan contains no reference to women-only services. Women-only services offer a vital form of specialist VAW provision and without specialist women-only services many women would not access any form of support at all. It is essential that the document acknowledges the value and legality of women-only services and that ring fenced funding is allocated to the women's VAWG sector.

The document still requires further development and there is a vital need for further explanation of who the 'VAWG third sector' is (this group is repeatedly referred to without further explanation). It is important to clarify this term so that the voluntary sector is made aware of what specific types of organisations and services the GEO plans to support. It is also essential that the document specifies how much money will be distributed to which type of organisations and what role other government departments may play in this project. We would appreciate further clarification on whether this document is being developed in cooperation with other government departments and would like to see a much clearer link drawn between this plan and the Home Office led cross government strategy on ending VAWG, as we believe that this plan should be viewed as subset of that overarching strategy.

The Strategic Plan offers a range of positive proposals for the future of VAWG organisations however the issue of implementation poses the key challenge to the strategy's effectiveness. We welcome efforts to foster effective partnership between the government and the third sector, however, the ultimate success of such policies, is dependent on enforcement action being taken to make sure local authorities meet their requirements regarding VAWG services, as opposed to encouraging local authorities in adopting best practice. To be effective the GEO must ensure that local authorities will take ownership of their local VAWG strategy and fund specialist VAWG services, including specialist women-only services.

## Cash

Strategic plan objectives	Proposed actions
<p>1.1 Clarify the role of central Government funding to the VAWG third sector including:</p> <ul style="list-style-type: none"> <li>• Combining central government funding streams into a one-stop process to deliver efficiencies for central Government and the VAWG third sector.</li> <li>• Effectively communicating the role of local commissioners to ensure that VAWG services are provided and available across England.</li> </ul>	Where appropriate develop combined funds for SV and other VAWG sectors for instance through programmes such as Total Place.
	Move towards Compact compliant three-year funding where appropriate as outlined in the cross-government violence against women and girls strategy and as exemplified by Department of Health standard practice
<p>1.2 Develop links between central and local government for seed-funding and pilot projects to:</p> <ul style="list-style-type: none"> <li>• Increase the sustainability of the VAWG third sector.</li> <li>• Achieve buy-in from local and central government.</li> <li>• Develop clarity about responsibilities for funding direct service delivery and services provided by national and umbrella organisations</li> </ul>	Collate and disseminate good practice on match funding of projects by local and central government.
	Collate and disseminate good practice on exit strategies (put in place when funding is coming to an end) that have led to sustainable funding.

### WRC comments

We are very concerned that the section regarding cash contains no indication of how much will be spent, who it will be distributed to and where this money will come from. Clarification of government funding priorities will assist voluntary organisations in developing an informed opinion on the proposed plans and providing useful feedback to the GEO. In addition to clarifying the role of central government funding; the plan should also refer to the role of local government funding and other types of funding. In areas where the government does not intend to take responsibility for funding it should be clear where women should expect to find funded services and how these will be maintained.

With regard to plans to 'move towards' compact compliant three-year funding streams we appreciate the GEO's acknowledgement of the need for ongoing financial support of VAWG organisations however we urge that stronger action is taken on this issue. The government has had a longstanding commitment to the Compact and we are eager to see that three year funding streams are implemented as soon as possible across the sector rather than slowly and intermittently

introduced. Within the area of sexual violence we are particularly eager to see the current emergency funds for the sexual violence sector replaced with an ongoing financial commitment from government.

The objectives outlined in section 1.2: 'achieving buy in from local and central government' and 'developing clarity around responsibilities for funding direct service delivery' cannot be achieved using the proposed actions of solely collecting and disseminating information on good practice. This action requires further development and we encourage the GEO to work collaboratively with the Office for Civil Society, Equality and Human Rights Commission and other government departments to ensure that this happens.

Whilst we welcome increased allocation of funding to the VAWG sector, we feel that it is unnecessary to introduce 'seed-funding' and new pilot projects. Instead we advise that the GEO provides more support to established women's organisations which are already providing effective solutions to VAWG. Women's organisations have longstanding experience in working with female survivors of violence and provide tailored services suited to individual's needs. In order to meet its desired objectives the GEO must deal with the issue of the financial instability of women's organisations and ensure that they receive adequate financial support.

## Commissioning

Strategic plan objectives	Proposed actions
<p>2.1 Encourage funders and commissioners to consider engaging with VAWG third sector organisations, where appropriate, in order to:</p> <ul style="list-style-type: none"> <li>• Enable seamless provision of services appropriate to victims needs.</li> <li>• Support the sustainability of the VAWG third sector through longer contracts.</li> <li>• Enable agencies to agree/negotiate quality standards.</li> </ul>	Support Sexual Assault Referral Centres to develop robust partnerships which include VAWG third sector organisations.
	Support the development of findings from the consultation by the Home Office on the draft commissioning guidance to support local commissioners and partnerships in commissioning VAWG services.
<p>2.2 Assess the impact of changes to Supporting People funding on the VAWG third sector.</p>	Use monitoring available from the devolved Supporting People programme to see if it is possible to measure any impact of changes in funding to DV sector as new contracts are agreed.
<p>2.3 Increase knowledge and ability, and in some cases capability, of commissioners to support understanding of the VAWG third sector, and their contribution to the commissioning processes.</p> <p>Increase understanding and ability, and in some cases capability, of the VAWG third sector to engage in commissioning processes.</p>	Collate and disseminate information on good practice in commissioning VAWG third sector groups.
	Incorporate information on the VAWG third sector into existing training on commissioning third sector groups.
	Carry out capacity building work with VAWG umbrella organisations on commissioning (see section 3)
<p>2.4 Encourage diversity of provision through local commissioning processes (that can include grant making) to meet the needs of the diverse groups and service users.</p>	Collate and disseminate information on good practice in supporting diversity of provision at local level.
<p>2.5 Work with existing assurance processes to agree effective ways of working with commissioners to improve their delivery.</p>	Feed into the development of relevant commissioning assurance processes through meetings and commenting on documentation.

## WRC comments

We welcome plans to encourage diversity of provision through local commissioning processes to meet the needs of the diverse groups and service users, however there is a lack of local targets surrounding funding of sexual violence services and other marginalised forms of VAW. It is essential that the GEO supplements its proposals with targets to ensure that all forms of VAW are funded. Recent guidance from the Equality and Human Rights Commission (EHRC) regarding revisions to gender equality schemes requires public authorities to take action on the causes and consequences of VAWG<sup>1</sup>, this requirement should also be included in local government targets.

We support plans to promote transparency and inclusiveness in commissioning processes and these proposals could potentially reduce the threat posed by generic services and create 'a more equal playing field' where women's organisations can compete for funding. The success of these plans however is contingent on the government educating commissioners about the value and legality of women-only services and taking enforcement action which will require local government to fulfil their legal obligations and hold those who fail to account. There is already a wealth of documents which promote good practice in commissioning, what is needed is strength to enact these plans.

Section 2.1 of the commissioning chart outlines plans to '*encourage* funders and commissioners *to consider* engaging with VAWG third sector organisations, *where appropriate*'. We believe that the words used within this passage are too weak and commissioning already requires commissioners to do this if they are to undertake an efficient commissioning process. We suggest that the GEO rewords this text so that the section's clear objective is to 'enable funders and commissioners to engage with VAWG third sector organisations.'

As an additional improvement to the chart on commissioning, we feel it would also be useful for the GEO to identify other government departments that will act as their partners in implementing the Strategic Action Plan. For example, the Office of Government Commerce will have a role in regulating commissioning good practice. Clarity on the roles and responsibilities of other government departments will increase voluntary organisations' understanding of how these plans will be implemented in practice.

It is essential that the GEO inserts specific information into the plan relating to the women's sector and acknowledges and understands the unique disadvantages faced by women-only providers when trying to access funding. The myth that gender equality has been achieved, inequality in commissioning processes and underrepresentation of women in local decision-making all increase the undervaluation of women-only services and reduce the likelihood of women's organisations obtaining funding. It is only by addressing these structural disadvantages that the GEO can ensure women's organisations financial sustainability and make a substantive difference.

---

<sup>1</sup> Equality and Human Rights Commission, 2010, A practical guide to revising gender equality schemes, [http://www.equalityhumanrights.com/uploaded\\_files/PSD/a\\_practical\\_guide\\_to\\_revising\\_gender\\_equality\\_schemes.pdf](http://www.equalityhumanrights.com/uploaded_files/PSD/a_practical_guide_to_revising_gender_equality_schemes.pdf)

With regard to information relating to changes to Supporting People funding, we already know of the devastating impact it has had on specialist women-only service provision and will highlight the importance of having ring fenced funding for women's organisations throughout our response. The Women's Resource Centre has already conducted research into funding to women's refuges and will use examples such generic housing services taking over refuges to show how inappropriate generic service provision often is<sup>2</sup>.

---

<sup>2</sup> Women's Resource Centre, 2007, Funding to London Women's Refuges  
[http://www.wrc.org.uk/includes/documents/cm\\_docs/2008/f/fullreportrefugefundingresearch.pdf](http://www.wrc.org.uk/includes/documents/cm_docs/2008/f/fullreportrefugefundingresearch.pdf)

## Capacity building

Strategic plan objectives	Proposed actions
3.1 Streamline consultation with VAWG third sector to avoid consultation burdens and duplication for groups.	Work with the Women’s national Commission to enable the voices of the VAWG third sector to be fed into government.
3.2 Central government and other national capacity building funds for national VAWG umbrella organisations to strengthen their capacity (and therefore that of front-line groups), to engage with decision makers, commissioners and funders.	Fund work with VAWG umbrella organisations - including internal development and provision of advice to groups on areas such as management and governance.
	Where appropriate, take account of VAWG third sector umbrella organisations and frontline groups in developing policy and programmes for generic capacity building programmes.
3.3 Encourage local level capacity building of front-line VAWG third sector organisations to support delivery of effective services.	Where appropriate, generic local funding for capacity building for third sector capacity building takes into account VAWG third sector front-line groups.
3.4 Encourage effective working for front-line VAWG third sector organisations, (alongside other front-line third sector organisations were appropriate), to increase their efficiency and their impact on service users.	Encourage VAWG and other third sector umbrella organisations to signpost VAWG third sector front-line groups to good practice in sharing backroom facilities.
	Develop and deliver a project to encourage the use of trustees with a business background in the VAWG third sector.

### WRC comments

We agree with the projects proposals to streamline consultation with VAWG organisations to make it easier for diverse groups to respond. It is essential that smaller group’s voices are heard and their views are considered as part of the consultation process. As a general recommendation, we also suggest streamlined funding for the VAWG third sector so that organisations can apply to a single source of funding, rather than repeatedly applying for separate sources of funds. This simple action will increase the efficiency in access to funding and save time and administrative costs, as well as preventing the stress of meeting different monitoring requirements and dealing with short term finances and late payments.

The issue of generic local funding for third sector capacity building which takes into account VAWG third sector front-line groups raises the problem of an absence of existing local

targets. In order to help achieve its objectives the GEO will need to introduce targets to encourage best practice amongst local government.

We welcome the proposals to encourage effective working for front-line VAWG third sector organisations to increase their efficiency and impact however we are concerned that this action specifically focuses on shared services. We feel it would be more helpful to broaden this objective beyond shared services to have a wider and more positive effect. We are also concerned about the plans to use more trustees with a business background in VAWG to encourage effective working amongst frontline organisations. We believe it would be more relevant to encourage involvement of trustees with a service delivery background from other sectors in order to ensure that their focus is on efficiency and impact for the benefit of service users rather than applying generic business principles.

## General

Strategic plan objectives	Proposed Actions
4.1 Ensure the Compact and Equalities Duties (before and after the Equalities Bill) are understood and implemented, and reflect the needs of the VAWG third sector and their service users.	Feed into the development of OTS, EHRC and other relevant guidance and policy development.
	Collate and disseminate information on good practice in use of the Compact and Equalities Duties.
4.2 Build on the work of the Cross-Governmental Working Group on VAWG Services to demonstrate commitment and oversee development and delivery of the Strategic Action Plan.	Ensure meetings of the Working Group include the sustainability of VAWG third sector as an agenda item and that it continues to develop the action in this Strategic Action Plan.
4.3 Gather information on the VAWG third Sector to inform the future development of the Strategic Action Plan.	Carry out research on the sustainability of the VAWG third sector and meet with VAWG third sector umbrella organisations to discuss the Strategic Action Plan.
4.4 Consider the equalities implications of the characteristics of age, disability, race, religion and belief, sexual orientation, and geographic area as well as gender (including transgender) in relation to cash, commissioning and capacity building for VAWG third sector provision.	Focus on the needs of women from all equalities groups, in rural as well as urban areas, in the work.

### WRC comments

We welcome plans for the GEO to meet with VAWG sector organisations to discuss the Strategic Action Plan however we believe that this action should be taken further. We urge the GEO to use the views of these organisations to inform the implementation of the Strategic Action Plan and any future research that is undertaken.

Women's organisations are an invaluable resource for those researching the VAWG sector and we encourage the GEO to work with women's organisations to utilise their expertise. The End Violence Against Women Coalition are leaders in research regarding the sustainability of the VAWG sector and can provide a strong evidence base which can inform the GEO's work. We advise the GEO to use existing sector research to consolidate its knowledge rather than replicate existing studies. The government conducted extensive research as part of the strategy to end VAWG and it is more efficient for the GEO to convert

its existing knowledge into action rather than carry out further research which will take additional time and resources.

We welcome proposals to enforce the Compact and Equalities Duties; however we feel that the plan does not address existing problems of implementation at local level. We encourage the GEO to work collaboratively with the Office for Civil Society, the Department for Communities and Local Government and the EHRC to ensure that local government fulfills its legal requirements. We also appreciate the plans to focus on the specific needs of women from all equalities groups and encourage the GEO to enlist the services of organisations who are 'led by and for' women from specific groups, such as black minority ethnic, refugee, LGBT, traveler and disabled communities to inform their research.

