



Consultation response

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

July 2010

Understanding and supporting
women and their organisations

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About the Women's Resource Centre

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.

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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 Women's Resource Centre has closely consulted with its members on the Strategic Action Plan and has produced the following response which reflects their views.

Please note that this response has been formatted to correspond with the questions asked in the Government Equalities Office's Survey Monkey survey.

3. Questions

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?

- Yes

4. Cash

1. 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?

- No

2. 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?

We feel that it is unconstructive to prioritise any of the individual actions listed within this section. To be effective in supporting the VAWG third sector the GEO must implement a series of measures to support its sustainability and be responsive to the needs and recommendations of women's organisations. We urge the GEO to review its proposed actions in this section in light of our following concerns:

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. There needs to be greater overall transparency in decision making about how funding is awarded and explanation of why it is withdrawn. The plan needs to clearly explain how a level of funding is assessed and what happens when a source of funding comes to an end. 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.

The VAWG third sector needs core funding to mitigate the impact of commissioning. To ensure the survival of organisations the government must provide sustainable funding and ensure that support for existing services remains and that they are expanded according to need. We are extremely concerned that the plan's proposals to provide seed funding are short term and will pull money away from other projects and take away money from mainstream funding. The document also requires further clarification about how the plans regarding match funding will work in practice and who precisely will match it. It is essential that the GEO address these key issues to support the VAWG third sector and ensure the sustainability of specialist services which effectively meet women's needs.

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 long standing 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. As part of broader issues surrounding funding streams; it is essential for the GEO to acknowledge and respond to the need for separate funding streams for domestic violence and sexual violence services.

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 central and local government work together. We are disappointed that the overall document does not contain any information on how other government departments will assist in implementing the plan and urge the GEO to clarify the role of Office for Civil Society and Commissioner for the Compact in relation to the strategy.

It would be extremely beneficial to explain how the plan fits in with wider government policies such as the 'Big Society' and we 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. In order to ensure that the sector receives sustained funding the GEO must encourage the government to make VAW a priority. To be a success the plan requires commitment and development from across

government departments. We hope that the GEO is able to gather support across Whitehall and continues to work in partnership with women's organisations on this document.

3. 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?

We strongly disagree with plans 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.

4. 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?

- yes

5. 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.

We are extremely concerned that the plan does not explain how match funding will work and precisely who will match it; without this vital information we are unable to express substantive comments on how our organisation would use this. We urge the GEO to provide greater clarification on this topic.

5. Commissioning

1. 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?

- No

2. 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?

We feel that is unconstructive to prioritise any of the individual actions listed within this section. To be effective in supporting the VAWG third sector the GEO must implement a series of measures to support its sustainability and be

responsive to the needs and recommendations of women's organisations. We urge the GEO to review this subsection in light of our following concerns:

We are gravely concerned that the actions outlined within section 2 will insufficiently address the practical problems faced by women's organisations in commissioning processes. Local authorities have a tendency to work with the same organisations and often fail to engage with minority organisations. Many VAWG organisations have witnessed misuse of the Gender Equality Duty and in some cases women's organisations have been forced to change their constitution so as to help men.

It is paramount that the Strategic Action Plan acknowledges the value and legality of women only services and their role as a vital form of specialist service provision. We demand that women-only services are explicitly referred to in this plan and that the GEO 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 also addressing these structural disadvantages that the GEO can ensure women's organisations financial sustainability and make a substantive difference. As part of a strategy to address these problems we believe that the GEO should enlist specialist voluntary organisations to provide training to help commissioners better understand these issues.

The GEO needs to actively challenge commissioners that will not engage with women's organisations. This is an issue that must be imminently acted upon as the expertise of women's organisations (particularly smaller specialist organisations) is currently at great risk as local authorities implement the start of ongoing cuts throughout the financial recession. Central government needs to assert greater control over local government on the issue of commissioning and the GEO must impress on ministers that this is an urgent situation as many organisations will only receive funding for the next 3-6 months before their grants finish. The GEO needs to preserve specialist organisations and should quickly issue guidance to commissioners regarding tenders for VAW organisations.

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. We ask that the GEO closely monitors how funding decisions are being made at a local level and takes action where appropriate. 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; we urge that this requirement should also be included in local government targets.

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 and that separate streams are provided for domestic and sexual violence. We also ask that the GEO addresses the need for separate provision for male victims of violence as this responsibility is often inappropriately left to the women's sector. This problem places providers in the dangerous situation where male victims some of whom are actually perpetrators interact with and compromise the safety of female victims.

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.

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 encourage the GEO to familiarise itself with existing women's sector research on this topic. The Women's Resource Centre has already conducted research into funding to women's refuges and has clear evidence of the detrimental effect of awarding contracts to generic service providers for VAWG services.

3. 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?

We believe that disseminating good practice is insufficient to achieve the objectives outlined in section 2. For example, point 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 insist 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.' we urge the GEO to take stronger action in order ensure the sustainability of the VAW Third Sector.

4. Does your organisation think the proposals (under actions 2.1 through to 2.5) align with your responsibilities as a Commissioner of local services and support for women and girls?

- n/a.

6. Capacity Building

1. 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?

- No

2. 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?

Again we feel that is inappropriate and unconstructive to prioritise any of the individual actions listed within this section. In order to build the capacity of the VAWG third sector the GEO must simultaneously implement a series of measures to support its sustainability and address the sector’s concerns about actions within the action plan. 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 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. We believe that this form of engagement should also involve second tier organisations as they offer access to a broad range of networks of women’s organisations and can assist in coordinating responses. Membership bodies like the Women’s Resource Centre should be integrated into consultation processes but should be paid for their efforts.

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.

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.

3. 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?

Whilst we recognise the benefits of having trustees with a business background 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. We are concerned about a possible clash between business culture and the voluntary sector and believe that funds for this kind of project should instead be redirected to supporting frontline services.

4. 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?

- don't know

If you answered NO, please briefly state what you or your organisation think is the best method for government to manage consultation(s) with the VAWG third sector in order to avoid consultation burdens and duplication for groups.

5. 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?

- Yes

If you answered NO, do you or your organisation have other ideas for supporting volunteering at trustee level in the VAWG third sector?

6. 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

7. General

1. 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?

- No

2. 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?

We feel that it is unhelpful to prioritise the actions listed within this section and are deeply concerned that it does not contain any information in relation 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 government needs to develop a genuine understanding of the importance of women-only services and there must be recognition of the needs and benefits for women. This is an issue that should not only be addressed in the general section but throughout the document as a whole. The plan's objective should be shaped by a woman-centred approach and the plans need to also value women-centred outcomes in the monitoring and evaluation process.

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. We strongly recommend that the GEO places its focus on funding organisations which specifically assist women victims of crime. Services such as Rape Crisis centres; offer holistic women centred services and work with women to meet their individual needs. They address historic instances of abuse and provide a vital opportunity to secure justice for victims.

3. 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?

We believe that it is unnecessary for the GEO to gather further information about the VAWG third sector. 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. The women's sector possesses a wealth of research regarding its sustainability and the GEO has already spent large sums commissioning research by New Philanthropy Capital. 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 carrying out further research which will take additional time and resources. Women's organisations are facing real and immediate financial threats to their survival and the GEO must act now to support the sustainability of the sector.

4. 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?

We are extremely disappointed that the GEO has asked respondents to compare and prioritise equalities characteristics in relation to cash, commissioning and capacity building for VAW third sector provision. It is integral that the government recognise the diversity of the female experience and fund women's organisations to provide tailored specialist services that are sensitive to women's different needs. Women's organisations that are 'led by and for' women from specific communities are highly effective at meeting women's needs and it is essential that a range of specialist services spanning all characteristics are commissioned. We also ask that the strategic action plan is reviewed to explicitly mention a broader range of specialist VAW services such as organisations dealing with female genital mutilation and 'so called' honour based violence.

Some groups of women experience greater marginalisation and isolation and have particular experiences as a result of being both female and dealing with the impacts of racism, xenophobia, homophobia, disabilism, class, poverty, health status etc. (often referred to as intersectional discrimination). Women-only services develop to meet need, so those services which are led by and for specific communities of women, such as Black and Minority Ethnic, lesbian, bisexual, older and younger women, lone mothers, mental health survivors etc. are crucial as they empower women to develop a sense of autonomy and self-determination.

Black and ethnic minority (BME) women often want to access women-only space for cultural reasons. As noted in the Women's Resource Centre's 2007 'Why Women-Only' report; many women feel that can safely explore experiences of trauma with women who shared similar cultural backgrounds and understandings, and where they could speak in their own language and be understood. There is, of course, a need for appropriate services for other equalities groups of women, such as disabled women, young women or lesbian women. The benefits of providing a space for specific communities of women, many of whom have experienced particular forms of marginalisation and exclusion, include mutual understanding and support, staff who have expertise in issues, and generally empowering women through role modelling and solidarity.

5. 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?

- Yes

If you answered YES, briefly state the particular geographic issues, if any, you or your organisation think need to be taken into account.

As outlined in the Equality and Human Rights Commission report Map of Gaps there are huge inconsistencies in VAW service provision across the UK. Women located within rural communities have more limited access to specialist support services and those without access to transport will have less mobility to escape

violent environments. Women in rural areas will be more likely to use national helplines or seek information about available support from the internet. Due to their geographic location many women may not be able to access the internet and may experience difficulties in helplines due to limited mobile phone reception. These restrictions are something that the GEO must take into consideration within its strategy to ensure that VAWG services are sustained and expanded to meet all women's needs.

6. 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?

As part of its plans to support the VAWG sector we also ask the GEO to acknowledge the practical limitations faced by women's organisations. 20% of women's organisations costs go on monitoring and evaluation; this needs to be scaled back in future so we can deliver our work more widely and efficiently.

With regard to plans to streamline funds we must stress that combining funds does not mean reducing. We insist that where the government merges funds it must make sure that level of funding is maintained.

7. Would you or your organisation be willing to be contacted after the consultation is complete to discuss your response(s)? (This is separate to question 9 on whether or not your organisation is willing to be involved in the proposed project to encourage volunteering).

- Yes

8. 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

9. Do you or your organisation have any other brief comments you wish to make in relation to this survey?

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.

The Strategic Action Plan needs to be reviewed in light of the women's sectors' comments and the GEO must address the gaps within its strategy. For example, links to prevention and education work are missing within the plan we ask that the document is amended to reflect the importance of this vital work carried out by the VAWG third sector. The GEO must work with and acknowledge the practical problems faced by women's organisations and work with them to ensure that the strategy effectively meets women's diverse needs. We are concerned that local funding will result in some minority groups (especially vulnerable women) missing out on services and that local provision does not fit with the practicalities of Domestic Violence service provision- for example a place of safety needs to be away from a place of danger. As opposed to a focus on localism we wish for the GEO to acknowledge and promote the importance of cross-authority working on VAWG.

With regard to the former question regarding the Women's National Commission (WNC) we believe that the WNC provides an important mechanism for ensuring women's views are represented to government. The WNC is an essential tool in raising the profile of the work of VAWG organisations and is a symbol of the importance of integrating women into government policy making. We hope that the GEO will engage with both membership bodies such as the Women's Resource centre and the WNC to access and include an expansive range of women's organisations in consultations and offset the burdens of the consultation process.