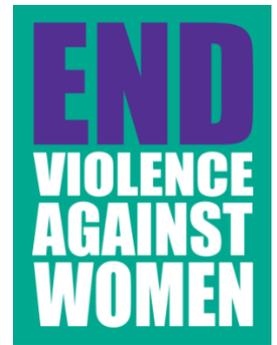


The Rt Hon Rishi Sunak MP
Chancellor of the Exchequer
HM Treasury
1 Horse Guards Road
London SW1A 2HQ



Thursday 30 September 2021

Dear Rishi Sunak,

Re: The Comprehensive Spending Review and funding towards ending and preventing violence against women and girls

We write as organisations working in the specialist ending violence against women and girls (VAWG) sector regarding the enormous costs of VAWG to the state and our communities. We ask that it is considered a priority to allocate specific funding for the support services and work needed to prevent and ultimately end abuse. We also submit this letter as a formal representation to the Comprehensive Spending Review.

The harm and costs of violence against women and girls

There is wide consensus that we are dealing with what has been termed an “epidemic” of violence against women and girls in the UK. In the year ending March 2020, an estimated 1.6 million women in England and Wales experienced domestic abuse. A woman is murdered every three days; 62% by a current or former partner, and 618,000 women between the ages of 16 and 74 were sexually assaulted. 90% of girls have been sent unsolicited explicit sexual pictures or videos and 92% have experienced sexist name-calling.

Home Office research published in 2019 estimated that the economic and social cost of domestic abuse alone is £66bn every year, with direct costs to the Exchequer totalling over £5 billion annually – including £2.3 billion in health services, £1.3 billion in police costs, £550 million in housing costs, £476 million in criminal and civil legal costs, and £724 million for services for victims; and a staggering £14bn in lost working days.

Such figures are stark and yet we know this is only part of the picture. We believe it would be valuable for the Treasury and relevant departments to work with us to develop a similarly robust figure for all forms of violence against women and girls. While costings are under-developed for sexual violence and abuse, one Home Office assessment looking at the costs of rape and sexual offences to society and the victim, estimated this would cost the UK £12.2 billion per year. In contrast to this high cost, NHS cost savings alone from VAWG organisations amounts to over £357 million per year.

Regarding other forms of gender-based violence, any expert in these fields will tell you that there are serious financial costs to victims and survivors and to the wider community arising

from child sexual abuse, harassment, sexual exploitation. This includes costs related to loss of work and educational opportunities, addiction, homelessness, criminal justice costs and much more.

It is not cost effective to allow violence against women and girls to persist at the levels it does and absorb all these costs annually as though it is inevitable and cannot be prevented.

The 'demand' for support services

Younger women, Deaf and disabled women, Black, minoritised and migrant women and LGBT+ survivors can all find it harder than others to be believed and to access support services and the justice system if they choose to do so. Disabled women are more likely to be experiencing abuse from a current partner and are three times more likely to experience abuse as non-disabled women. For these reasons, investment in specialist VAWG services is so vital, yet the funding landscape of these services is such that any individual trying to access justice or support is very likely to face a postcode lottery, with long waits. Survivors often find that no provision is available to them.

The led "by and for" Black and minoritised women's sector, run by women who are expert in the needs of women from minoritised communities, experience very high levels of self-referral because these services are known and trusted, unlike other agencies. This sector is chronically under-funded, with close to half of its services at risk of closure. The expertise of the "by and for" Black and minoritised women's sector provides innovative community-based services incorporating prevention through to recovery for Black, minoritised and migrant women and children, who are often excluded from universal services. This sector saves the public purse millions every year.

Rape Crisis Centres are oversubscribed, with demand and waiting lists continuing. It is beyond time for central Government to intervene in and ensure strategic and sustainable funding for the specialist voluntary sector such that no woman is turned away.

The current competitive tendering process by which most VAWG services are commissioned, alongside austerity, has created a toxic environment for specialist VAWG services. Current procurement processes favour larger organisations and contracts, and disadvantage smaller well-established specialist VAWG services – who deliver high-quality support to meet the needs of survivors - but which cannot compete on an equal footing in an 'open market'.

The procurement of public services in open competition is harming and undermining the future of specialist VAWG services, by prioritising cost over quality and specialist expertise, and fails to deliver the support women and children need. As Imkaan has documented, procurement also has a disproportionate impact on specialist services led by and for Black and minoritised women, which tend to be smaller, and face even greater barriers to 'competing'. 15 years of austerity cuts and the year-on-year decommissioning of specialist community-based Black and minoritised services under public procurement has had a devastating impact on the sector and therefore the safety of Black and minoritised women and girls. Yet, throughout 2020-21, in the midst of a pandemic that disproportionately

impacted on Black and minoritised communities, these services continued to deliver their vital, life-saving support to those who needed it.

Widespread, systematic reform to the current competitive funding and commissioning landscape is imperative to ensure the specialist VAWG sector can fairly access strategic investment, to build back a society better able to respond to VAWG in all its forms and secure the economic recovery this country needs after the impact of the pandemic. This includes a return to ring-fenced, long-term grant funding for specialist VAWG service provision and an end to competitive tendering where it is not required - by legally removing the need for competitive tendering of vital life-saving services.

The UK signed the Istanbul Convention in 2012, yet England and Wales are nowhere near the levels of provision it states are necessary, with victim support services struggling to meet demand. These local support services are usually run by women with deep knowledge of the dynamics of abuse, and they have strong track records and high self-referrals rates. The specialist voluntary sector is unequivocally best-suited to helping women rebuild their lives and regain independence, including being good parents and getting back to work in many cases. We cannot afford not to fund these services sustainably.

The Istanbul Convention strongly recommends that states have minimum levels of support provision including:

- at least one family place in a shelter or refuge for every 10,000 women;
- a community based advice or advocacy project for every 50,000 women;
- and a specialist sexual violence centre for every 200,000 women and in every region.

Proposal for strategic investment now to bring down harms and costs long-term

Domestic Abuse: In 2019, Women’s Aid produced a national assessment of the investment needed annually to fund the domestic abuse support sector, *Funding specialist support for domestic abuse survivors*. These estimates were based on the development of a unit cost for every 10,000 population and gave one cost for refuge services and another for community-based support services.

Women’s Aid has updated our assessment to account for population rise and inflation. We now estimate that a total annual investment of £181m is needed to fund a national network of refuge services which meets the needs of women and children and a further £228m to fund community-based support services – a total investment of £409m a year.

Investment needed to fund domestic abuse services in England	
Type of cost	Cost for England (5,655 units)
Refuge services	£180,931,852
Community-based support services	£228,376,027
Total	£409,307,879

As before, this is subject to the six prerequisites shown below:

1. Ring-fenced funding for the 'by and for' expert sector
2. Availability within the domestic abuse sector of the full range of service types
3. Effective and sustainable funding of the wider support sector
4. Provision for women with no recourse to public funds (NRPF)
5. Availability of housing benefit to cover housing costs for refuge services
6. Funded coordination and oversight/monitoring.

The Treasury should also ensure that funding for the national Helpline and local helplines is placed on a more sustainable footing.

Sexual Violence: It is estimated that spending pledges are needed of at least £102.7 million annually to ensure specialist sexual violence and abuse services are available for victims and survivors. In the longer term, our Istanbul Convention obligation would require the creation and development of 320 Rape Crisis Centres to meet the needs of the population, which would require an investment of £416 million.

'By and for' Black and minoritised women's support services: The total cost of delivering specialist support services in the Black and minoritised women and girls sector alone is £97, 085, 661 annually. This cost addresses an existing sector funding shortfall of 39%. The annual cost of providing refuge services totals £13,253,569. The annual cost of delivering trauma-informed wraparound holistic support services totals £83,832,092.

Funding to address the inequalities in access to support and outcomes for migrant survivors

There are vast inequalities in access to support and outcomes for migrant survivors, which have not been addressed to date in existing legislation or strategies concerned with VAWG. The reduction in 'by and for' specialist services, cuts to legal aid and the expansion of the Home Office's 'hostile' or 'compliant' environment has culminated in a dire situation for migrant survivors who have insecure immigration status and are subject to the No Recourse to Public Funds (NRPF) condition. As the Step Up Migrant Women campaign has documented, many survivors are fearful of reporting abuse in the first instance due to their dependency on their abusers, the weaponisation of their immigration status, and the embedding of immigration control within statutory and voluntary services, including data-sharing agreements between the police and the Home Office. For those who do seek help, 4 in 5 women with NRPF are turned away from refuges, and women and children are frequently denied help from local authorities, despite their statutory obligations under Section 17 of the Children Act 1989. The cohort of survivors subject to NRPF is also likely to expand in coming years, incorporating those on pre-settled status and those ineligible or unable to access the EU Settlement Scheme; and, should proposals to introduce a 'temporary protection status' be enacted in legislation through the Nationality and Borders Bill, which will cause further harm to victims and survivors.

The existing Support for Migrant Victims Scheme does not offer a solution to this crisis, as it is a severely limited short-term pilot project (running until March 2022 only) and with capacity to assist a maximum of 500 migrant victim-survivors for a very limited period (up

to 12 weeks). Southall Black Sisters, awarded the grant for the scheme, has raised concerns that the £1.5m provided will only cover support for accommodation and limited subsistence for the small cohort of women eligible, which means that the provision of essential holistic, wraparound support continues to fall on by and for specialist services already under immense pressure.

The Spending Review presents an important opportunity to work towards redressing this situation - and fulfilling the Government's commitments to ratify the Istanbul Convention, 9 years after signing. This would include dedicated funding for specialist by and for services for survivors, including to provide holistic wraparound support to migrant women with NRPF. The new statutory duty alone does not resolve the exclusion of migrant survivors from support.

Proposal to support victims/survivors of Online VAWG

The Online Safety Bill aims to establish a framework for addressing illegal and harmful online content. However, we know that specialist organisations – the ones which women are most likely to turn to when they have experienced the wide and ever growing set of behaviours perpetrated online known as online VAWG - are severely underfunded and unable to respond to the huge levels of demand they face. The increasing dependency on the online world during the Covid pandemic has provided ample breeding ground for perpetrators to abuse women online. Between April 2020 and May 2021, Refuge has seen on average a 97% increase in the number of complex tech abuse cases requiring specialist tech support when compared to the first three months of 2020, demonstrating how increasingly critical specialist support for survivors is. The structure of funding and commissioning models mean that these specialist organisations are hard pushed to deliver their core work, and therefore unable to grow at the pace needed to be able to respond to these additional forms of harm.

There is a high incidence of online VAWG, with 1 in 7 young women having experienced threats to share their intimate images or videos, and the likelihood is that the prevalence is only set to grow. Financial provision for support for victims of online harms must be provided in order that they are able to receive independent, specialist and trauma-informed support and advocacy from organisations that are experts in responding to VAWG and working with online harms.

We propose a funding package for victims of online VAWG to be launched alongside the Online Safety Bill. The funding for this to be raised via either by 10% of the revenue raised from the Digital Services Tax ring-fenced to fund specialist VAWG sector efforts to effectively address online VAWG, with 50% ring-fenced for specialist 'by and for' led services for Black and minoritised women and girls.

Alternatively, we propose that 5% of any fines levied by Ofcom be directed to funding specialist VAWG sector support services, and for 50% of this amount to be specifically ring-fenced for specialist 'by and for' led services supporting Black and minoritised women and girls.

Preventing violence against women and girls

Any investment to end abuse must include work to prevent VAWG in the first place. Investing at such an early stage in young people's lives can have a major impact on the economic and social costs of VAWG. Furthermore, the recent Ofsted Review into sexual abuse in schools and colleges echoed what the specialist VAWG sector has been saying for years: that sexual harassment and abuse of girls is endemic and in every school. We must therefore seize this moment to implement Ofsted's recommendation putting in place a "whole school approach" to prevent sexual harassment and abuse in schools.

Any implementation of a "whole school approach" must involve the specialist VAWG sector, including "by and for" Black and minoritised, Deaf and disabled and LGBT organisations to ensure it is delivered within an intersectional framework. It is important that such consideration of intersecting inequalities and how they relate to girls' experience of VAWG and education, are taken into account in any funding allocated to the implementation of a "whole school approach" which must include mainstream schools and alternative provision.

At a time when schools are focused on catch-up education, and following lockdown for a significant part of last year - when we know many girls may have experienced trauma and abuse and would not have been able to disclose, it is more important than ever to invest in a "whole school approach" to stem the normalisation of sexual harassment, explicit image sharing and abuse.

National VAWG Communications Campaign

We were pleased to see the inclusion of a national communications campaign focused on raising awareness of violence against women and girls and creating behaviour change in the recently published VAWG Strategy. However, any significant, tangible reduction in VAWG will only be brought about by a commitment to a long-standing multi year campaign in order to bring about behaviour change and to challenge harmful social attitudes that drive gender inequality and minimise VAWG crimes. A significant, multi-year funding commitment is needed to support this work and ensure that the Government's campaign is a measurable success.

Perpetrator interventions

Part of preventing VAWG also means investing in safe and effective perpetrator interventions to reduce the harms caused by perpetrators and manage any ongoing risks they pose. It is estimated that only 1% of perpetrators of abuse get any kind of intervention to address their behaviour, and perpetrators continue to receive interventions that are neither quality assured nor safe.

We need to ensure quality assured perpetrator interventions are consistently available, however this must never come at the cost of sustainable funding for survivor support services. Support for survivors must always be separate and led by the specialist women's sector.

Public Services reform

It is critical of course that there are radical changes to public services in several key areas if we are to better support victims and survivors of abuse; and prevent abuse in the first place. In particular, we need: significant reform to social security policy; a radically reformed Family Court, housing reforms to protect refugees and move-on accommodation, pathways to enable the removal of perpetrators where this is safe, effective and what the victim wants, reform of adult social care, an end to the 'No Recourse to Public funds' condition for survivors which traps women and puts enormous pressure on support services; parity of esteem for mental health in the NHS, non-means tested legal aid for survivors; and mandatory training for frontline public services staff who are likely to come into contact with survivors. All of these changes, alongside sustainable funding for specialist services, would reduce the complexity of need and costs across systems in the long-term.

We look forward to receiving your response and we are available to provide further briefing on the figures and recommendations in this letter as necessary.

Yours sincerely,

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Farah Nazeer, CEO, Women's Aid Federation for England and Wales
Baljit Banga, Executive Director, Imkaan
Jayne Butler, CEO, Rape Crisis England & Wales
Pragna Patel, Director, Southall Black Sisters
Gisela Valle, Director, Latin American Women's Rights Service (LAWRS)
Dr Nicola Sharps-Jeffs, Chief Executive, Surviving Economic Abuse
Estelle du Boulay, Director, Rights of Women
Ruth Davison, CEO, Refuge
Sally Field, Chair, Woman's Trust
James Watson O'Neill, CEO, Signhealth
Gudrun Burnet, CEO, Standing Together
Frank Mullane, CEO, Advocacy After Fatal Domestic Abuse (AAFDA)
Diana Nammi, Executive Director, Iranian and Kurdish Women's Rights Organisation (IKWRO)
Alphonsine Kabagabo, Director, Women for Refugee Women
Anthea Sully, Chief Executive, White Ribbon UK
Yenny Tovar, Executive Director, Latin American Women's Aid
Sara Kirkpatrick, CEO, Welsh Women's Aid
Fiona Dwyer, CEO, Solace Women's Aid
Naana Otoo-Oyortey MBE, Executive Director, FORWARD
Donna Covey CBE, Chief Executive, Against Violence and Abuse (AVA)
Medina Johnson, Chief Executive, IRISi
Natasha Rattu, Director, Karma Nirvana
Sarah Hill, CEO IDAS (Independent Domestic Abuse Services)
Ioana Hanis, CEO, Stay Safe East