

# Grants Committee

## Commissioning of refuge provision for the 2022-2026 Grants Programme: Requirements and next steps **Item: 7**

**Report by** Rachel Buttrick      **Job title** Principal Project and Policy Officer  
**Date** 30 November 2022  
**Contact** Rachel Buttrick  
**Telephone** 020 7934 9972      **Email** [rachel.buttrick@londoncouncils.gov.uk](mailto:rachel.buttrick@londoncouncils.gov.uk)

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### Summary

In March 2021, Grants Committee agreed that the commissioning of refuge provision for the 2022-2026 Grants Programme should be deferred to 2022, due to the introduction of the Domestic Abuse Act 2021, which placed new duties on the Greater London Authority, as a Tier 1 authority for the provision of safe accommodation for people fleeing domestic abuse

To proceed with the call for proposals, the service specification for emergency specialist refuge provision is presented at this Grants Committee meeting for discussion and agreement.

### Recommendations

Grants Committee members are asked to:

- discuss, comment on and, subject to any proposed amendments, agree the Requirements (the service specification) for emergency specialist refuge provision for the London Councils 2022-2026 Pan-London Grants Programme (Appendix 1)
- note the next steps and timetable for implementing the emergency specialist refuge provision (Application Process and Schedule, page 20 of Appendix 1).

# **Commissioning of refuge provision for the 2022-2026 Grants Programme: Requirements and next steps**

## **1 Background**

- 1.1 Two consultations were undertaken prior to the commissioning of the 2022-2026 Grants Programme (February/March of 2020 and January/February of 2021), which showed a high level of support (95.7 per cent of respondents<sup>1</sup>) for continuing to fund refuge provision as part of the 2022-2026 Grants Programme.
- 1.2 The Domestic Abuse Act 2021 placed new duties on the Greater London Authority (GLA), as a Tier 1 authority, for the provision of safe accommodation for people fleeing domestic abuse. Since November 2020, the GLA has been consulting with local authorities (Tier 2 authorities in London) and providers on these new duties and has developed a needs assessment to consider the number and needs of those fleeing domestic abuse, and a strategy to consider how services should best be delivered across London. The GLA has undertaken some commissioning to secure support for those fleeing domestic violence.
- 1.3 In response to the consultation findings and being mindful of the new arrangements across London for commissioning services for those fleeing domestic abuse, Grants Committee agreed to defer the call for proposals for refuge provision to 2022 and roll over the existing grant for refuge services to 2022-23, to give time for the new arrangements to develop.
- 1.4 Provision for refuge services within the 2022-2026 programme was included in budget proposals, which were considered and agreed by Leaders' Committee in December 2021 (£840,000 per annum).

## **2 Developing the service specification**

- 2.1 The Requirements (Appendix 1) for emergency specialist refuge provision have been developed based on the findings from the consultations noted above, along with expert input from the London Councils policy lead for Violence against Women and Girls and the findings from the [Mayor's Domestic Abuse Safe Accommodation Strategy](#).

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<sup>1</sup> Combined rate for both consultations

2.2 Several key needs have driven the development of the specification:

- longer-term, on-going support, for example, longer-term counselling support for survivors of domestic abuse
- joined up/multi-agency working, particularly, the need for the successful applicant(s) to build relationships with Safe Accommodation services commissioned by the Mayor's Office for Policing and Crime (MOPAC) under Part 4 duties of the Domestic Abuse Act
- support for increasing mental ill health
- support for increasing multiple and complex needs

2.3 Several key target groups that emerge from the needs assessment were also focussed on when developing the specification:

- people who are disabled or have a learning disability
- people with no recourse to public funds and/or insecure immigration status
- people who are LGBTQI+
- people who are Black or from a global majority community

### **3 Market warming**

3.1 Two market warming events were scheduled for 25 November and 1 December. As these events will take place following distribution of this report, a verbal update on levels of interest, and feedback from the first session, will be provided at the committee meeting.

### **4 Funding available through Part 4 duties of the Domestic Abuse Act**

4.1 Refuge provision commissioned through the Grants Programme, will deliver alongside services that have been (and will be) commissioned as part of the Mayor's statutory duty under Part 4 of the Domestic Abuse Act 2021. This section sets out key information about that funding.

4.2 The additional funding made available through Part 4 duties of the Domestic Abuse Act is exclusively for revenue spending on support services within safe accommodation, and cannot be used for capital purposes, such as purchasing new accommodation. It is explicitly prohibited to use this funding for support services for victims and survivors in temporary accommodation (this restriction

has proved challenging due to lack of physical bed spaces and accommodation in which to deliver support).

- 4.3 Additionally, the funding cannot be used to support people with no recourse to public funds.
- 4.4 The Greater London Authority and MOPAC held a commissioning round in late 2021/early 2022 to commission services to provide support in safe accommodation on a pan-London basis. The funding was for new services and/or service expansion only and included a dedicated commissioning lot for support delivered by specialist led-by-and-for services. The following categories of provision were funded through this round (not all services have been published):
- expanding housing Independent Domestic Violence Advocates (IDVAs) and other pathway support to assist victims and survivors navigating the housing system
  - enhancement of support available in existing accommodation (e.g., counselling, and therapeutic support, support for children in refuge)
  - additional funding for support for survivors experiencing multiple disadvantage
  - creation of new refuge provision
  - funding for Domestic Abuse Housing Alliance (DAHA) accreditation/training for housing providers to improve their response to domestic abuse.
- 4.5 The requirement to avoid duplication across commissioners needs to be considered alongside evidence of acute and chronic demand pressures. Findings from the [pan-London Domestic Abuse Safe Accommodation Needs Assessment](#) included the need to expand provision of refuge accommodation across London to better meet the demand from victims and survivors and enable freedom of movement between boroughs as needed. Demand pressures were echoed in both the London Councils' consultations (see paragraph 1.1) and feature in the needs assessment for emergency refuge accommodation.
- 4.6 When considering demand pressures, and the less restrictive nature of Grants Programme funding, there are opportunities for London Councils and MOPAC to maximise both funds to provide support for more people who need it and work with sector specialists to develop higher-quality services over the coming years.

## **5 Requirements for emergency specialist refuge provision**

- 5.1 The requirements document provides an overview of the full grants programme, a needs analysis setting out the current picture regarding domestic and sexual abuse across London, the specification for emergency specialist refuge provision and the application schedule and process.
- 5.2 A series of general requirements that cut across the entire programme are set out for potential applicants, alongside the specific requirements for emergency specialist refuge provision
- 5.3 The proposed outcomes (page 18 of the Requirements (Appendix 1)) are targeted and express the key impacts for that London Councils expects to see for people receiving support. In turn, these outcomes offer high returns for boroughs as people gain/recover their confidence to act independently and support themselves.
- 5.4 The requirements for monitoring and reporting (page 15 of the Requirements, (Appendix 1)) were agreed by Grants Committee at the July 2021 AGM as part of agreeing the full prospectus for all other services areas for the 2022-2026 Grants Programme.
- 5.5 As noted at paragraph 2.2, the successful applicant(s) will need to build relationships with Safe Accommodation services commissioned by MOPAC under Part 4 duties of the Domestic Abuse Act throughout the life of the grant. MOPAC commissioned services will also develop and mature during the life of the London Council grant. Through Part 4 duties funding, we expect to see an increase in pathway support and co-ordination, as well as specialist services to address multiple and complex needs. As the services covered by these funds are either to be commissioned, or are in the pre-mobilisation phase, we do not yet fully understand the impact of these services on the domestic abuse support landscape. The successful applicant(s) will need to adapt and work with new services as they are mobilised over the next few years and work closely with those services to support referrals and pathways into safe accommodation. Some flexibility on prioritisation and investment for the support elements of the service will also be needed over the three-year period of the grant.

## **6 Next steps and on-going Grants Committee involvement**

- 6.1 Subject to any amendments and agreement from Grants Committee, the requirements will be published, along with the application form, on Thursday 1 December. The application window will be open for six weeks.
- 6.2 As the service needs to be up and running by 1 April it is recommended that the decision to award the grant is taken by Grants Committee Executive so the grants team can undertake necessary actions prior to the service start date (Application Schedule and Process, page 20 of Appendix 1).

## **7 Recommendations**

- 7.1 Grants Committee members are asked to:
  - 7.1.1 discuss, comment on and, subject to any proposed amendments, agree the Requirements (the service specification) for emergency specialist refuge provision for the London Councils 2022-2026 Pan-London Grants Programme (Appendix 1)
  - 7.1.2 note the next steps and timetable for implementing the emergency specialist refuge provision (Application Schedule and Process, page 20 of Appendix 1).

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### **Financial Implications for London Councils**

A decision on the annual funding for the programme will need to be agreed by Leaders' Committee.

### **Legal Implications for London Councils**

London Councils manages the London Councils Grants Programme on behalf of all the boroughs and the City of London. The Programme makes grants to voluntary organisations to deliver improved outcomes for Londoners.

The Programme operates within a scheme made under Section 48 of the Local Government Act 1985. It is a collective scheme i.e. all the boroughs fund the Programme, through a levy contribution based on the boroughs proportion of the capital's population. Boroughs must exercise their functions in respect of the scheme 'with due regard to the needs of the whole of Greater London'.

Leaders' Committee determines the principles and priorities of the Programme and the overall budget of the Programme. The Grants Committee commissions services, makes awards of

funding, manages projects' performance and may advise Leaders' Committee on the Programme.

The legal requirements of good decision-making by public authorities, in summary, require the following:

1. **Declaration of interests:** The principle being, a decision maker should not be a "judge in his own cause". Where a decision-maker has an interest in the subject of a decision he is making it is likely to preclude his participation in the decision where – the decision will affect a friend or relation, the decision-maker has a financial interest in its outcome, the decision-maker is a director of an organisation affected by the outcome of the decision, the decision-maker is a member of group campaigning for one outcome or another, the decision maker's spouse, civil partner or other close family member has an interest in the outcome. Although a close connection with the subject of the decision will automatically disqualify a person from making a decision, declaration of a less direct interest before a decision is made may permit them to take part. In the latter circumstances the person concerned and any colleagues participating in the decision-making process must decide whether the connection would lead a fair-minded and informed observer to conclude that there was a real possibility that the decision-maker would be biased if they took part. London Councils has policies and procedures to assist in managing these matters, with Members being required to comply with their own authority's Code of Conduct.
2. **Following correct procedure:** A decision-maker will often be required to follow a set procedure for making its decisions, whether set out in statute or set by the decision-maker itself. Any such procedures are usually drafted with the purposes of both ensuring the decision-maker takes into account all relevant considerations as well as ensuring procedural fairness for those affected by the decision. In taking decisions which engage consideration of specific duties, such as the equalities duties, any process must ensure that those duties are also met. In your case, this will ensure that you turn your mind to, and can evidence that you have had due regard to the public sector equality duty in taking the decision. As you know this does not necessarily require a formal public consultation or EIA (but see below). Examples of prescribed procedures for decision-makers include express duties to: consult, give reasons for decisions, be informed of a right to appeal (if there is one), etc. NB: Whilst it is necessary for a public body making decisions to follow a set procedure that will not of itself render the procedure fair, and in certain circumstances it may also be appropriate/fair to depart from the published procedure.
3. **Consultation:** Public bodies are required by law to consult before making decisions, particularly in the context of making policies or issuing guidance. In some cases, there is an express duty to consult and a statutory process which must be followed. There is no express statutory requirement to consult under the Grants Scheme, although in having due regard to the needs of the whole of Greater London in making the scheme and exercising the relevant functions under section 48 of the Local Government Act 1985, and specifically in meeting the duty under subs 48(10) to keep the needs of the whole of Greater London under review, one must have regard to the general public law principles and requirements relating to consultation. There is published government guidance (<https://www.gov.uk/government/publications/consultation-principles-guidance>) and London Councils should have regard to this guidance

In summary: a public authority has a wide discretion in choosing the options upon which to consult; consultation may be an iterative process; consultation must be lawful (and

therefore fair), and such consultation must also be adequate; consultation should be proportionate to the potential impact of the proposal or decision being taken; it should be undertaken at a formative stage in developing the proposals; the timeframe for any consultation should be proportionate and realistic to allow stakeholders an adequate time to consider and respond; the information provided as part of the consultation should be useful and accessible, the objectives of the consultation clear, and the public authority must give sufficient reasons for any proposals being consulted upon to allow for intelligent consideration and response; those consulted should be aware of the criteria that will be applied by the public authority when considering proposals and which factors will be considered decisive or of substantial importance at the end of the process of consultation, such as in evaluating the consultation responses or in taking the decisions informed by the consultation; consultation need not be formal and in writing, and there are a number of ways of engaging with stakeholders which may be appropriate e.g. by email or web-based forums, public meetings, working groups, focus groups and surveys; etc.

If a public authority has promised it will engage in consultation before making a decision it would normally be unfair not to do so. Public bodies should be mindful of any public statements/guidance that may have issued promising consultation e.g. where decisions engage equalities issues. Past practice may imply a promise to consult again on the same type of decision - fairness generally requiring that the practice of consultation is continued. Even if there is no promise or past practice of consultation, the nature and impact of the decision may mean that fairness requires it.

Measures of the severity of a decision's impact include - the extent to which it unexpectedly alters the existing position or legitimate expectations of the affected individuals/groups; or the severity of consequences of the decision on the affected individuals/groups; etc. The product of the consultation must be conscientiously taken into account in finalising proposals.

4. **Rational and evidence-based:** A public body must take rational decisions. An irrational or unreasonable decision is one that was not objectively rational and reasonably open to the decision-maker. Evidence-based decisions help to ensure that decisions are objectively reasonable.
5. **All relevant considerations:** A decision maker must ensure that it takes into account all relevant considerations in reaching a rational and evidence-based decision. The subject matter of the decision will inform what is relevant. EG: the proposal, response to consultation, guidance on parameters for decision, costs of decision, effects of the decision on others (including, for example, having due regard to the decision-makers' public sector equality duty), advice from officers, etc.
6. **Proper purpose:** A public body must act for a proper purpose and in taking their decisions decision-makers must apply their minds to the correct statutory objective. A public body must act in good faith.
7. **Proportionate:** Public decision-makers should act in a way that is proportionate. Proportionate decisions are also likely to be rational, evidence-based and reasonable.
8. **Properly reasoned:** Procedural requirements on public decision-makers require that reasons must be given for their decisions. Reasons do not need to be excessively detailed but do need to be adequate. Adequate decisions – deal with all the substantial points that have been raised; are sufficient for the parties to know whether the decision-maker has



made an error of law; set out and explain key aspects of the decision-maker's reasoning in coming to its conclusion; include all aspects of reasoning that were material to the decision; but do not need to set out in detail all the evidence and arguments referred to by the decision-maker. The reasons for decisions should be recorded at the time the decisions are made.

9. With reference to the above, the standard grounds for judicial review are on the basis that a decision: was unlawful/ultra vires; was irrational; or was procedurally unfair - in that the decision-maker has not properly observed the relevant procedures (whether set by statute or by itself) e.g. it has failed to consult or give reasons for its decision, or there has been a failure to observe the principles of natural justice in the decision-making process e.g. evidence of bias.

Further, a public authority should also be careful not to raise a further ground of challenge if, through their own conduct or statements, they have established a legitimate expectation as to how the public body will act. A legitimate expectation may arise exceptionally in three cases – where the decision-maker has made a clear and unambiguous representation that it will adopt a particular form of procedure above and beyond that which it would otherwise been required to adopt; where the claimant has an interest in some ultimate benefit that it hopes to attain or retain fairness may require the claimant to be given an opportunity to make representations; and where the decision-maker has a substantive right on which it was reasonable for the claimant to rely. Public bodies may change their policies or depart from them (and so not fetter their discretion), and so a legitimate expectation will only arise if departure from the existing policies was an abuse of power.

### **Equalities Implications for London Councils**

In reaching decisions for the implementation of any future grants programme, the Committee is required to have due regard to its obligations under the Equalities Act 2010, particularly the Public Sector Equalities Duty.

London Councils' funded services provide support to people within all the protected characteristics (Equality Act 2010), and targets groups highlighted as particularly underrepresented or more affected by the issues being tackled. Funded organisations are also required to submit equalities monitoring data, which can be collated across the grants scheme to provide data on the take up of services and gaps in provision to be addressed. The grants team reviews this data annually.

### **Background Documents**

Grants Committee, 17 March 2021, Item 6 - Grants Programme 2022-2026: Planning and implementation

**London Councils**  
**2022-2026 Pan-London Grants Programme**  
**Emergency Refuge Accommodation**

**Requirements**  
**1 December 2022**

**Deadline for applications: 12 noon, 13 January 2023**  
**Start Date: 1 April 2023**

**DRAFT**

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# Introduction

## London Councils

London Councils is the collective of local government in London. Where shared ambitions are developed, agreed, championed, and delivered at London Councils by members working together. Where boroughs speak as one and collaborate with the government, the Mayor of London, the London public sector, the third sector, business, and other key UK and international cities.

## London Councils pan-London Grants Programme

London Councils plays a key role in working with London's boroughs, their communities and the voluntary and community sector to find city wide solutions to key issues affecting our residents. Under Section 48 of the Local Government Act 1985, London Councils is empowered to make grants to voluntary organisations to deliver activities and services to support those solutions.

The [Leaders' Committee](#) sets the overall funding strategies, policies, and priorities for grants to voluntary organisations.

Leaders' Committee agreed that the 2022 to 2026 Grants Programme should focus on two priorities:

- combatting homelessness
- tackling domestic and sexual abuse.

Decisions on individual grants and the operation of the programme are made by the Grants Committee, comprising members of each of the 32 London boroughs and the City of London.

In March 2021, the [Grants Committee](#) agreed that the commissioning of refuge provision for the 2022-2026 Grants Programme should be deferred by one year, due to the introduction of the Domestic Abuse Act 2021, which placed new duties on the Greater London Authority (GLA) to commission support services for survivors of domestic abuse and their children in safe accommodation in London. The decision to delay recommissioning was made to allow the commissioning of refuge provision to take into account the new service landscape.

The arrangements for funding and managing the Grants Programme are set out in the Funding and Performance Management Framework [LINK]. The framework is designed to:

- ensure that services are delivered to the people who need them, and that services improve lives and create opportunities for people to succeed
- give the Grants Committee confidence that London Councils has in place systems of oversight, control and reporting to ensure that funded organisations deliver the required outcomes in a manner that provides value for money for the taxpayer and mitigates potential risks.

# Programme Aim and Objectives

## Aim

The pan London Grants Programme 2022-2026 aims to support London's boroughs to reduce homelessness, and domestic and sexual abuse.

This programme will add to the collective effort from local government, the voluntary and community sector, and others across the capital who work to ensure families - whether that is a family of one or many - have a home and are safe.

## Objectives

### Overarching

- Reduce pressure on public services through an outcome led approach
- Complement (and not duplicate) borough and other housing, homelessness, and domestic abuse services where it is economical and efficient to deliver services on a London wide basis
- Complement (and not duplicate) borough and other domestic abuse services where mobility is key to the delivery of a service that secures personal safety
- Work with statutory and non-statutory partners to contribute to meeting the objectives of the Equality Act 2010
- Tackle homelessness and domestic and sexual abuse through partnership working
- Measure and monitor existing and emerging needs to inform the ongoing development of appropriate, high-quality services

### Homelessness (services that PREVENT - SUPPORT - MAINTAIN)

- Prevent homelessness through the provision of effective support and advice
- Manage and minimise the effects of homelessness where it cannot be prevented
- Secure sustainable accommodation and appropriate support for homeless households; maximise supply and choice for temporary or longer-term accommodation for homeless people
- Identify and respond to rough sleeping through provision of services and accommodation
- Ensure relevant professionals are trained to provide effective, timely and appropriate responses to people at risk of homelessness or who are homeless

### Domestic and sexual abuse (service that PREVENT - SUPPORT - ENABLE)

- Increase awareness and challenge attitudes of violence<sup>2</sup> against women, domestic abuse and sexual violence; increase awareness in children and young people of the importance of safe, equal and healthy relationships and that abusive behaviour is always wrong
- Make early intervention and prevention a priority
- Provide victims with equal access to appropriately resourced, high quality, needs led, strength based<sup>3</sup>, culturally responsive services
- Ensure relevant professionals are trained to provide effective, timely and appropriate responses to victims and survivors

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<sup>2</sup> This programme does not focus on gang violence. The Mayor's Office for Policing and Crime has invested £1.91million in the London Gang Exit programme, led by Safer London. The investment in London Gang Exit builds on intervention coaches already funded by London's Violence Reduction Unit.

<sup>3</sup> Strengths-based (or asset-based) approaches focus on individuals' strengths (including personal strengths and social and community networks) and not on their deficits. Strengths-based practice is holistic and multidisciplinary and works with the individual to promote their wellbeing. It is outcomes led and not services led.

## Needs Analysis

### Prevalence of Violence And Abuse

- The Domestic Abuse Act 2021 created a statutory definition of Domestic Abuse. Domestic Abuse is a pattern or single incident of abusive behaviour and includes a wide range of behaviours, including physical and sexual violence, economic abuse, emotional abuse and harmful practices including forced marriage and so called “honour-based” violence. Coercive and controlling behaviour has now been recognised as a key component of domestic abuse and a risk factor for serious violence and domestic homicides and is included in the statutory definition of domestic abuse. Children who witness domestic abuse are also now recognised as victims of abuse in their own right.
- There are many barriers to reporting domestic abuse and it is often a hidden crime; therefore, it is challenging to accurately establish prevalence. The Crime Survey of England and Wales (CSEW) is considered to be one of the more robust indicators of prevalence of domestic abuse. Estimates from the latest CSEW report in March 2022 indicated that 5.7 per cent of adults, and 6.9 per cent of women, between ages 16 and 59 had experienced domestic abuse in the past year<sup>4</sup>.
- Police recorded domestic abuse offences and domestic abuse incidents represent only a proportion of actual domestic abuse taking place in London, and fluctuations in rates of abuse may be due to changes to reporting practices rather than changes in actual prevalence. There were 96,860 domestic abuse offences recorded in London in the 12-month period ending August 2022, with a rate of 10.8 abuse offences per 1,000 population. There is significant borough variation in the level of recorded domestic abuse offences; for example, Barking and Dagenham had 16.2 recorded offences per 1,000 population, in contrast to Richmond where there were 5.8 recorded offences per 1,000 population<sup>5</sup>.
- The number of domestic homicides in London has fluctuated over the past decade, with a high of 31 in 2013. In 2021 there were 24 homicides recorded by the Metropolitan Police Service (MPS) that were flagged as involving domestic abuse, compared to 22 in 2020 and 26 in 2019<sup>6</sup>.
- 25,801 sexual offences were recorded by the MPS between October 2021 and September 2022 inclusive, of which 9,289 were rape<sup>7</sup>. There has been a sharp increase in reported sexual offences over the last two years, following a drop in reported sexual offences during the height of the pandemic in 2020. As with Domestic Abuse offences, police recorded sexual offences are only a proportion of total offences and changes in reporting do not necessarily reflect changes in prevalence.
- Modern Slavery is a complex crime encompassing human trafficking, slavery and forced labour; in human trafficking cases exploitation can take many forms including sexual exploitation and forced marriage. A disproportionate percentage of modern slavery cases occur in London. In 2021, 12,727 individuals were identified as victims of modern slavery; almost a third of whom were in London<sup>8</sup>. This count is likely to understate cases identified through the National Referral Mechanism (NRM) due to data limitations, and there will be many cases not identified through the NRM. On both NRM referrals and police recorded crime data, males make up a greater proportion of identified victims (58 per cent according to police recorded crime data year end March 2019). Females are far more likely to be identified as victims of sexual exploitation; 63 per cent of females who were

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<sup>4</sup> [Office for National Statistics – June 2022](#)

<sup>5</sup> [Metropolitan Police Service – accessed October 2022](#)

<sup>6</sup> [Metropolitan Police Service - accessed October 2022](#)

<sup>7</sup> [Metropolitan Police Service – accessed October 2022](#)

<sup>8</sup> [Human Trafficking Foundation 2022](#)

referred in the year ending December 2018 were potential victims of sexual exploitation compared with five per cent of males<sup>9</sup>.

- In 2021, the Foreign Office's Forced Marriage Unit gave advice and support in 337 cases related to a possible forced marriage and/or possible female genital mutilation (FGM). It also responded to 868 general enquiries<sup>10</sup>.
- According to the FGM Enhanced Data Set annual report for 2021/22, there were 5,620 individual women and girls who had a NHS healthcare setting attendance where FGM was identified; in London 2,080 individual women and girls had a healthcare setting attendance where FGM was identified.<sup>11</sup>
- So called "Honour Based" Abuse encompasses a range of incidents and offences, and significantly overlaps with domestic abuse, sexual violence and exploitation including forced marriage. It is defined by the CPS as "an incident or crime involving violence, threats of violence, intimidation, coercion or abuse (including psychological, physical, sexual, financial or emotional abuse) which has or may have been committed to protect or defend the honour of an individual, family and/or community for alleged or perceived breaches of the family and/or community's code of behaviour." There is limited data available on honour-based abuse as data collection of HBA flagged offences only began in 2019 and is limited by the challenges around police reporting. 2,725 HBA reported offences were recorded in England and Wales in year end March 2021<sup>12</sup>.
- It should be noted that for domestic abuse, sexual violence and other Violence Against Women and Girls (VAWG) related offences, criminal justice outcomes are poor and have been worsening progressively over the past five years. The COVID 19 pandemic has contributed to a significant court backlog, which has exacerbated issues with both the police and the Crown Prosecution Service (CPS) leading to low prosecutions and convictions and worse experiences for victims. In her 2021 rape review, the London Victims' commissioner found that only one per cent of rapes reported to the police ended in conviction<sup>13</sup>.
- The cost-of-living crisis has led to increased reports of economic abuse and controlling behaviour linked to the cost of living, with services reporting greater demand for financial advice and support. In a survey of survivors by Women's Aid, 66 per cent of survivors said that abusers are now using the cost-of-living crisis as a tool for coercive control and 73 per cent of women living with and having financial links with their abuser said that the cost-of-living crisis had either prevented them from leaving or made it harder for them to leave<sup>14</sup>.

## Service Pressures

- Victim support services and specialist abuse services reported an increase in contacts and referrals over the course of the COVID 19 pandemic. In the year ending March 2021, the National Domestic Abuse Helpline supported 49,756 people, a 22 per cent increase from 40,859 in the previous year; this was generally driven by peaks in calls during periods of national lockdown<sup>15</sup>. In a survey of organisations by the Women's Resource Centre, 74 per cent of organisations in London reported increased demand<sup>16</sup>. High demand for support services in the year ending March 2020 led to 63 per cent of referrals of women to refuge services in England being declined; the main reason in England being because of a lack of capacity to support survivors.

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<sup>9</sup> [Office For National Statistics March 2020](#)

<sup>10</sup> [Foreign, Commonwealth and Development office – July 2022](#)

<sup>11</sup> [NHS Digital – August 2022](#)

<sup>12</sup> [Home Office – December 2021](#)

<sup>13</sup> [London Victims' Commissioner - December 2021](#)

<sup>14</sup> [Women's Aid - August 2022](#)

<sup>15</sup> [Office for National Statistics – November 2021](#)

<sup>16</sup> [Women's Resource Centre – June 2020](#)



- London Councils funded services supporting survivors of abuse have been reporting growing complexity of cases, including survivors with complex and high-risk mental health needs including disordered eating and suicidal ideation. Access to trauma informed, domestic abuse focused mental health care, including through statutory mental health services, has been repeatedly flagged as a major barrier for survivors.
- The Domestic Abuse Commissioner is completing a comprehensive mapping of domestic abuse services England and Wales alongside a nationwide survivor survey. In her early findings published in 2022, the commissioner found that the most sort after form of support is counselling (desired by 73 per cent of survivors) and mental health care (65 per cent of survivors), and that access to long term mental health support remains a significant gap.

## Refuge and Other Safe Accommodation Provision and Demand in London

- Over the past decade there has been a general increase in refuge provision, with 945 refuge spaces in London as of 1 May 2021. In year end March 2022, 1,098 women and 868 children were placed in refuge. Despite a general increase in refuge provision, supply does not currently meet demand, with 927 unsuccessful instances of referrals into refuge for this time period<sup>17</sup>. Due to the methods of calculating unsuccessful instances, this is highly likely to be a significant understatement of total unmet need. The Domestic Abuse Commissioner found that in London, less than half of those who wanted access to refuge provision received it<sup>18</sup>. There is significant variation in refuge space provision across London, with some areas falling below the ratio of spaces to population<sup>19</sup>.

### Refuge provision over time in London (on 1st May each year)

Year	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Refuge spaces	798	756	722	793	799	815	812	854	892	907	904	945
Refuge services	62	58	54	57	53	55	56	60	59	60	59	60

- In 2020/21, over 49,000 households were owed a prevention or relief duty in London. 4,870 of these households (9.9 per cent) were owed a duty as a result of domestic abuse<sup>20</sup>.
- London has a longer average length of stay for survivors in refuge (5.5 months) in comparison to regions outside London (3.7 months). This is likely due to a range of factors including the shortage of affordable accommodation in London making relocating to settled accommodation a major barrier for move on. Rental prices in London have rebounded since the pandemic which means there is very limited affordable housing. For example, for single parents in receipt of benefits with two children aged over four, only 0.8 per cent of private rented sector housing in London would be affordable to them. For single parents with three children aged over four, this drops to 0.1 per cent<sup>21</sup>. The lack of affordable housing puts increasing pressures on refuge spaces.
- Overall, refuge spaces in London are not accessible to particular groups. As can be seen in the chart below, only a small percentage of refuge vacancies are open to women with no recourse to public funds (NRPF), women with multiple children, and wheelchair users. Other than an increase in refuge provision for women with NRPF, this position has not improved over time.

<sup>17</sup> Women's Aid – Routes to Support Data accessed October 2022

<sup>18</sup> [Domestic Abuse Commissioner – June 2021](#)

<sup>19</sup> [Mayor of London – December 2021](#)

<sup>20</sup> [Department for Housing, Communities and Levelling September 2022](#)

<sup>21</sup> [London Councils and Savills – August 2022](#)



## London refuge vacancies for groups by quarter

Quarter	Total vacancies	Woman plus 2 children	Woman plus 3 children	Woman with NRPF	Wheelchair accessible
2018-19 Q1	445	34% (150)	9% (39)	4% (18)	<1% (1)
2018-19 Q2	398	31% (124)	6% (26)	1% (5)	1% (4)
2018-19 Q3	403	32% (127)	6% (24)	6% (23)	<1% (2)
2018-19 Q4	365	30% (110)	6% (21)	7% (24)	<1% (1)
2019-20 Q1	403	31% (123)	5% (22)	3% (11)	<1% (1)
2019-20 Q2	403	31% (123)	5% (22)	3% (11)	<1% (1)
2019-20 Q3	304	33% (100)	5% (14)	6% (17)	0% (0)
2019-20 Q4	350	39% (135)	6% (20)	2% (8)	<1% (1)
2020-21 Q1	313	30% (94)	5% (16)	4% (14)	<1% (1)
2020-21 Q2	389	35% (135)	6% (24)	8% (30)	<1% (2)
2020-21 Q3	376	31% (116)	8% (29)	11% (40)	<1% (3)
2020-21 Q4	343	32% (109)	6% (21)	8% (29)	<1% (1)
2021-22 Q1	385	29.9% (115)	9.4% (36)	5.5% (21)	0.5% (2)
2021-22 Q2	383	31.6% (121)	6.3% (24)	5.5% (21)	0.3% (1)
2021-22 Q3	383	31.1% (119)	5.2% (20)	9.1% (35)	0.8% (3)

## Equalities Impact

- Sexual violence, domestic abuse and exploitation cut across all levels of society. Applicants should be able to demonstrate their ability to address issues faced by people with protected characteristics (Equalities Act 2010) through their service delivery.
- For many individuals from communities that are marginalised or minoritised due to protected characteristics, mainstream domestic abuse and sexual violence services are not fully accessible and do not provide the best form of support. Specialist “by and for” organisations provide support for such communities that are not well served by mainstream provision. These services include organisations supporting black and global majority survivors, LGBT+ survivors, and survivors with disabilities. London is the most well provisioned region in England and Wales for by and for services, with 44 per cent of these services located in the capital. However, by and for services typically are smaller, have less access to statutory funding and are more vulnerable to instability due to funding arrangements<sup>22</sup>. This instability has a direct and negative impact on survivors from marginalised communities.
- Income inequality is a well-established factor in experiencing abuse. The Crime Survey for England and Wales (CSEW) in 2019/20 highlighted that more than twice as many women in the lowest income bracket (less than £10,400 per annum) recalled an experience of domestic abuse (11.8 per cent) compared with those in the highest household income bracket (£52,000 per annum) (5.4 per cent).<sup>23</sup> This is likely to be exacerbated by the cost-of-living crisis.

<sup>22</sup> [Domestic Abuse Commissioner – June 2022](#)

<sup>23</sup> [Office for National Statistics – November 2020](#)

## Gender and Sex

- Domestic abuse and sexual violence are crimes that disproportionately, but not exclusively, impact women. In 2021/22 93.4 per cent of those referred to a Multi-Agency Risk Assessment Conference (MARAC) in London were female<sup>24</sup>. While men make up most homicide victims, women make up most victims of domestic homicide. In its analysis of Domestic Homicide Reviews (2021), the Home Office found 80 per cent of domestic homicide victims were women, and 73 per cent of victims were killed by a partner or ex-partner. For the year ending March 2021, female victims were most likely to be killed in or around a house, dwelling or residential home (81 per cent)<sup>25</sup>.
- There is limited community-based support available for male victims and survivors of abuse, and there is currently no safe accommodation available for men in London.

## Race, ethnicity and nationality

- Domestic Abuse and sexual violence are crimes that affect people of all races and ethnicities. However, black and global majority survivors can and do face additional barriers to accessing support, including institutional racism and services that do not reflect or understand survivors' experiences.
- Due to barriers highlighted above (see prevalence section), it is challenging to estimate rates of domestic abuse, and lower reported rates of domestic abuse in certain communities because of a range of factors (e.g., reluctance to disclose). According to ONS data, the ethnic groups most likely to report experiencing domestic abuse in the previous 12 months were mixed White/Black Caribbean individuals (10.6 per cent) and mixed White/Asians individuals (8.8 per cent). 5.9 per cent of white people reported having experienced abuse, compared to 3.7 per cent of black people and 3.6 per cent of Asian people<sup>26</sup>. In the year 2021/22, 44 per cent of cases considered at London MARACs concerned black and global majority survivors<sup>27</sup>.
- Black and global majority women are disproportionately referred into refuge. According to Routes to Support, 52 per cent of women placed in London Refuges in 2021/22 were 'Black and Minoritized Ethnic' (in the 2011 census, 40.2 per cent of people in London identified as Asian, Black, Mixed or other). Of the 927 unsuccessful instances of referral, 52 per cent concerned black and global majority women<sup>28</sup>.

## Immigration Status

- For migrant victims experiencing abuse, violence or exploitation, their migration status is often used as a tool by the perpetrator to exert control and isolate them from means of support. Denying victims access to paperwork, making it hard for them to prove their migration status, is a common form of abuse. Fear of immigration action is a significant barrier to migrant victims accessing support; among migrant victims and survivors interviewed by the Latin American Women's Rights Service, more than half feared that they would not be believed by the police because of their immigration status (54 per cent)<sup>29</sup>.

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<sup>24</sup> [Safe Lives – March 2022](#)

<sup>25</sup> [Home Office September 2021](#)

<sup>26</sup> [Office for National Statistics – February 2021](#)

<sup>27</sup> [Safe Lives – March 2022](#)

<sup>28</sup> Women's Aid Data Dashboard accessed October 2022

<sup>29</sup> McIlwaine, C., Granada, L., Valenzuela-Oblitas, I. (2019), The Right to be Believed. London: Kings College London, Latin American Women's Rights

## No Recourse to Public Funds

- The no recourse to public funds (NRPF) condition applies to migrants to the UK on a range of Visa routes, including work and student visas. Survivors of abuse with NRPF face multiple barriers to accessing support and escaping abuse. For most refuge places, the housing portion of the service is funded through Housing Benefit and thus the space is inaccessible to those with NRPF unless alternative funding can be found.
- Survivors with NRPF who are on Spousal visas may be able to apply for indefinite leave to remain through the domestic violence route and an accompanying concession allowing temporary access to public funds. The application process can be long and onerous and require support for service organisations.
- Local authorities have an obligation to support some households with NRPF who are eligible under either the Children's Act or the Care Act (for adults with care needs). Greater London supports a greater relative proportion of survivors with No Recourse to Public Funds than other areas. In the year ending March 2022, London received 3115 referrals or requests for support from households with no recourse to public funds. 61 per cent of households financially supported by local authorities were recorded by London Boroughs<sup>30</sup>.

## Impact of Brexit and EU Settlement Scheme

- Following the UK's exit from the European Union, EU residents in the UK were able to apply for settled status and thus recourse to public funds. 6.5 million applications were concluded as of June 2022, and of these 3.3 million (51 per cent) were granted settled status, 2.6 million (41 per cent) were granted pre-settled status and 9 per cent had other outcomes (including 306,300 refused applications, 133,000 withdrawn or void applications, and 124,560 invalid applications)<sup>31</sup>. Those granted pre-settled status or otherwise refused settled status do not have access to public funds. Therefore, there is a significant increase in the overall number of people with NRPF in the UK. EUSS applicants disproportionately live in London.

## LGBT+ People

- Estimating prevalence of domestic abuse and sexual violence against LGBT people is challenging, but existing research indicates LGBT people experience abuse at a higher rate than cisgender, heterosexual people. The 2020 CSEW found that Bisexual adults aged 16 to 74 were more likely to have experienced domestic abuse in the last year (15.2 per cent) than gay or lesbian (8.4 per cent), or heterosexual or straight adults (5.2 per cent)<sup>32</sup>.
- A YouGov survey (conducted between February and April 2017) asked more than 5,000 lesbian, gay, bi and trans (LGBT) people across England, Scotland and Wales about their life. Responses show that, overall, more than one in ten LGBT people (11 per cent) faced domestic abuse from a partner in the previous 12 months. This included 13 per cent of bi women and 10 per cent of lesbians. Twelve per cent of bi men and seven per cent of gay men reported experiencing domestic abuse from a partner. One in five trans people and non-binary people (both 19 per cent) faced domestic abuse from a partner. This includes 21 per cent of trans men and 16 per cent of trans women. One in six LGBT people aged 18 to 24 (17 per cent) faced domestic abuse from a partner in the previous 12 months. The survey shows that, Asian and global majority LGBT people are more likely than white LGBT people to experience domestic abuse from a partner, 17 per cent compared to 11

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<sup>30</sup> NRPF Connect September 2022

<sup>31</sup> [Home Office – June 2022](#)

<sup>32</sup> [Office for National Statistics – November 2020](#)

per cent. One in seven LGBT disabled people (15 per cent) experienced domestic abuse<sup>33</sup>

- Abuse experienced by LGBT people is often linked to their identities, with homophobia and transphobia weaponised by perpetrators to perpetuate abuse. In an April 2022 survey of LGBT people, 53 per cent of respondents felt their LGBT+ identity was linked to, or the reason for, at least one instance of sexual violence they were subjected to<sup>34</sup>.
- LGBT people are more likely to experience familial violence, which can be linked to their identities. In a survey of 5000 LGBT people conducted by GALOP, 29 per cent of respondents reported experiencing familial abuse; and of those 60 per cent felt that their LGBT+ identity was a part of the reason they were abused<sup>35</sup>.
- There are a small number of LGBT+ domestic abuse services; most are victim support services based in London. Only a small number of organisations provide specialist domestic abuse safe accommodations for LGBT+ people, and there is a particular lack of provision for GBT+ men and trans people<sup>36</sup>.

### Older People

- For the year 2021-22, the number of women over 60 placed through routes to support was too small to be reportable<sup>37</sup>.
- In 2019 over 280,000 people aged 60 to 74 (3.1 per cent) experienced domestic abuse in England and Wales and one in five (22 per cent) victims of domestic homicides were over the age of 60<sup>38</sup>.
- There is a lack of specialised domestic abuse services for older people in London, and older people are less likely to access services. Older people, especially those over 65 who experience abuse, are often referred through adult safeguarding processes rather than domestic abuse processes. Additionally, where domestic abuse does occur, older people may have difficulties in accessing refuge support because of accessibility issues.
- Older adults' experiences of domestic abuse is often different from those of younger people. Victims and survivors over 60 are more likely to be victimised by a current partner or by an adult family member. Older men are also significantly more likely to experience domestic abuse than young men<sup>39</sup>. Older victims are also significantly more likely to have a disability and the perpetrator of their abuse may also be their carer.

### Children and Young People

- The Domestic Abuse Act recognised for the first time in law that children who witness domestic abuse against their family members are themselves victims of abuse and should be recognised as such. Experiencing Domestic Abuse in childhood can cause long term harm to children and young people<sup>40</sup>.
- In England, the estimated prevalence of children aged 0-17 in homes where a parent is suffering domestic abuse is 65 per 1000 CYP. In London, the average prevalence is 73.08 per 1000, although this masks significant borough variation, with rates as high as 104 per 1000 in Hackney and 93.09 per 1000 in Islington, and as low as 57.44 per 1000 in Richmond upon Thames<sup>41</sup>.

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<sup>33</sup> [Stonewall, 2018](#)

<sup>34</sup> [Galop – April 2022](#)

<sup>35</sup> [Galop – April 2022](#)

<sup>36</sup> [Galop – February 2022](#)

<sup>37</sup> Women's Aid – Routes to Support Dashboard accessed October 2022

<sup>38</sup> [Age UK – 2019](#)

<sup>39</sup> [Safelives – October 2016](#)

<sup>40</sup> [Early Intervention Foundation – April 2021 https](#)

<sup>41</sup> [Children's Commissioner – accessed October 2022](#)

- Children make up a significant proportion of those placed in refuge. For the year 201-22, 51.3 per cent of women placed in refuge had children<sup>42</sup>, with an average of 0.8 children per woman in refuge. 64 per cent of female victims in London reported having children under the age of 18 in the house at the time they experienced abuse<sup>43</sup>.
- Victims and survivors with children face barriers accessing refuge accommodation, as most of the refuge accommodation in London cannot accept women with two or more children. Women with adolescent sons typically cannot be placed in standard refuge accommodation due to the requirement that refuge be single sex/gender.
- There is lack of refuge provision that can accept young women under 18 fleeing interpersonal violence in their own relationships (rather than placed with a parent). For 2021/22, young women and girls aged under 18 represented 22 per cent of unsuccessful instances of referral; in the same year, the number of young women under 18 placed was too low to report in the data<sup>44</sup>. 29 young women under 18 have been placed in refuge since quarter three 2017 according to Routes to Support.
- In the Domestic Abuse Commissioner's Early Mapping Report, the deficit in support for children affected by domestic abuse was highlighted. Notably, in Greater London, of survivors who wanted their children to access support, only 25 per cent were successful<sup>45</sup>.

## Disability

- People with disabilities are disproportionately likely to experience domestic abuse. The CSEW (19/20) reported that women and men with a long-standing illness or disability were more than twice as likely to experience some form of domestic abuse (11.8 per cent) than their counterparts with no long-standing illness or disability (4.6 per cent). Amongst women, this figure is higher with 14.7 per cent of female victims of domestic abuse reporting at least one disability<sup>46</sup>. As previously mentioned, there is a lack of wheelchair accessible services for survivors of domestic abuse.
- People with learning disabilities are particularly vulnerable to abuse; the Domestic Abuse Commissioner found that those with learning disabilities face particularly severe barriers in accessing support, with 54 per cent reporting it was difficult or very difficult to access support<sup>47</sup>.
- Mental health issues have been repeatedly highlighted as a support need for survivors of domestic abuse. Poor mental health can be a vulnerability exploited by abusers, as well as a consequence of experiencing abuse. Women who have experienced Intimate Partner Violence experience mental ill health such as depression and anxiety at a higher rate than those who have not experienced IPV.<sup>48</sup> In the Home Office's Analysis of Domestic Homicide reviews, 48 per cent of victims had mental illness listed as a vulnerability<sup>49</sup>.

## Multiple Disadvantage

- Victims and survivors of domestic abuse and sexual violence who experience multiple disadvantages face some of the most severe barriers for accessing support. Survivors with multiple disadvantages may experience a combination of challenges/support needs, such as: substance misuse issues, mental health issues (including SMI), a history of sexual exploitation/involvement with sex work and previous contact with the criminal

<sup>42</sup> Women's Aid Routes To Support Dashboard accessed October 2022

<sup>43</sup> [Mayor of London – December 2021](#)

<sup>44</sup> Women's Aid Routes to Support Dashboard accessed October 2022 - values are suppressed when < than 10

<sup>45</sup> [Domestic Abuse Commissioner – June 2022](#)

<sup>46</sup> [Office for National Statistics – November 2020](#)

<sup>47</sup> [Domestic Abuse Commissioner – June 2022](#)

<sup>48</sup> [Singh Chandan et al, British Journal of Psychology, June 2019](#)

<sup>49</sup> [Home Office September 2021](#)



justice system. Supporting survivors experiencing multiple disadvantages requires specialist knowledge and collaboration across services.

- Survivors with Substance misuse issues represented 2.5 per cent of women placed in refuge through Routes to Support in 2021/22 and 4.1 per cent of unsuccessful instances<sup>50</sup>.

## Policy Context

### Domestic Abuse Act 2021

- The Domestic Abuse Act received Royal Assent in May 2021. The Domestic Abuse Act contained a range of provisions design specification support victims and survivors of Domestic Abuse. For this specification, the key relevant provision is the Creation of a Statutory duty on Local authorities to provide support for survivors of Domestic abuse in Safe Accommodation.

### Part 4 duties of the Domestic Abuse Act

- Part 4 of the Domestic Abuse Act created a duty on the GLA as London's Tier 1 authority to provide support services for victims of domestic abuse in Safe Accommodation. The GLA has delegated delivery of this duty to the Mayor's Office for Policing and Crime (MOPAC).
- Under the Act, tier 1 local authorities have a statutory duty to:
  - assess the need for domestic abuse support in safe accommodation across London
  - prepare and publish a strategy for the provision of this support
  - give effect to the strategy that is commission the provision of support to meet the identified needs
  - monitor and evaluate the success of the strategy
  - convene a Partnership Board to advise on its exercise of the above duties
- London's boroughs have a duty to co-operate as far as reasonable with the GLA on all aspects of its new duties. London Boroughs provided individual needs assessment returns as part of the London wide needs assessment and have nominated representatives on the Pan London Domestic Abuse Partnership Board.
- MOPAC published [a needs assessment and strategy](#) outlining their approach to commissioning new services. The Mayor's Domestic Abuse Safe Accommodation Strategy identified the following priorities:
  - improving early intervention
  - improving access to and the provision of safe crisis accommodation, including improving the diversity of safe crisis accommodation types (e.g., dispersed accommodation)
  - improving access to and the provision of second stage and move-on accommodation, and resettlement
  - improving the quality of safe accommodation
  - tackling overarching issues.
- The strategy identified key issues relating to safe accommodation provision in London that are reflected in this needs assessment, including the insufficiency of current provision, geographic variation in provision and gaps in provision for particular groups. The strategy committed to improving strategic oversight and consistency of refuge service provision in London and to addressing gaps affecting particular groups, such as individuals with No Recourse to Public Funds.

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<sup>50</sup> Women's Aid Routes to Support Dashboard accessed October 2022

## Commissioning

- GLA and MOPAC held a commissioning round in late 2021/early 2022 to commission services as part of the Mayor's statutory duty under Part 4 of the Domestic Abuse Act 2021 to provide support in safe accommodation on a Pan London basis. The funding was for new services and/or service expansion only and included a dedicated commissioning Lot for support delivered by specialist "by and for services". Not all services commissioned have been published; however, we do know that the following categories of provision were funded through this commissioning round:
  - Expanding housing IDVAs and other pathway support to assist victims and survivors navigating the housing system.
  - Enhancement of support available in existing accommodation (e.g., counselling and therapeutic support, support for children in refuge)
  - Additional funding for support for survivors experiencing multiple disadvantage
  - Creation of new refuge provision
  - Funding for Domestic Abuse Housing Alliance (DAHA) accreditation/training for housing providers to improve their response to domestic abuse.

## Limitations of Part 4 duties

- Funding under Part 4 duties is exclusively for revenue spending on support services within safe accommodation, and cannot be used for capital purposes, such as purchasing new accommodation. It is explicitly prohibited to use this funding for support services for victims and survivors in temporary accommodation<sup>51</sup>. This restriction has proved challenging due to lack of physical bed spaces and accommodation in which to deliver support.

## Conclusion

- Safe Accommodation and refuge provision remain an essential service for supporting victims and survivors of abuse, violence and exploitation. Domestic abuse, sexual violence and other forms of exploitation remain major crimes that cause serious harm. Demand for support continues to rise, with needs becoming more complex and cases being held for longer. The nature of abuse continues to evolve, with perpetrators making use of new technology and adapting abuse tactics to current events.
- There is growing awareness of the impact of Domestic abuse and sexual violence on survivors, and the government has committed to increasing funds for services and targeting these funds towards specialist by and for organisations.
- There are significant gaps in the services and systems that should support those experiencing abuse, such as the severe shortage of affordable housing London, the backlogs in the courts and the low rate of convictions for sexual violence.
- The current level of refuge provision does not approach sufficiency and thus it is very challenging to calculate what the total unmet need is.
- There are certain groups that clearly continue to be underserved, including: victims and survivors with NRPF, disabled victims and survivors, BME victims and survivors, children and young people, and LGBT victims and survivors. It is also clear that particular needs of survivors in safe accommodation are often not being met, such as mental health support.
- It is currently a very challenging time for providers of refuge and safe accommodation services. The pandemic and resulting rise in need put significant pressures on service capacity and on staff. Providers are reporting greater complexity of need, and challenges in accessing statutory services.

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<sup>51</sup> [Department for Levelling Up, Housing and Communities, October 2021](#)

- The current high rate of inflation and rising utility and other costs has put significant financial pressures on service organisations and reduced to actual value of available funding, while at the same time increasing the need for support.
- The additional funding made available through Duty 4 of the Domestic Abuse Act is highly welcome and will no doubt the increase in provision will be of benefit to victims and survivors. We can expect an increase in pathway support and co-ordination, as well as specialist services to address multiple disadvantage. As the services covered by these funds either to be commissioned or in the pre-mobilisation phase, we do not yet fully know what the impact on the service landscape will be. The commissioned provider under this strand will need to adapt and work with new services as they are mobilised in the next few years. In particular, we expect that the commissioned service will work closely with services put in place to support referrals and pathways into safe accommodation.
- Survivors with NRPF and insecure immigration status continue to be a group extremely underserved by current provision, and a cohort that is likely to grow due to recent policy developments.
- The COVID 19 pandemic, the cost-of-living crisis, increasing pressures on other services and labour market challenges have all placed intense pressures on support services for survivors of violence and abuse. Therefore, we acknowledge that there are limits in what can be delivered within the current funding envelope and services must be focused on where they can add the most value.
- Therefore, the specification will ask bidding organisations to identify how much provision they will be able to provide within the funding available, rather than specifying required service delivery.



## Programme Requirements

*Applicants must fulfil the general requirements of the London Councils Grants Programme.*

### Geographical coverage

Applicants will need to demonstrate how they will provide services for all 32 London boroughs, and the City of London.

### Partnerships

Due to the pan-London coverage necessary to address the specification, it is anticipated that some applicants will form partnerships.

London Councils welcomes partnerships that include specialist led-by-and-for organisations that can bring lived experience, gender and culturally appropriate services to the programme.

London Councils funds partnerships via a lead partner. Whilst the lead partner will be required to comply with conditions of grant on behalf of all the partner organisations, all partners must meet the London Councils eligibility criteria.

Lead partners will need to put partnership agreements in place that, as a minimum, specify terms of reference, terms of grant, roles and responsibilities, and dispute resolution.

The lead partner will be responsible for undertaking due diligence, will be accountable for all grant funds and will be responsible for reporting to London Councils.

### General Requirements

Applicants must demonstrate:

- a track record of working collaboratively with boroughs and other statutory and voluntary agencies
- a track record of specialist work in the field of homelessness or domestic and sexual abuse **AND** a track record of specialist work with the target group(s) identified in the specification(s)
- how they will deliver non-statutory services that add value to, and do not duplicate, existing local services **AND/OR** engage and cooperate with boroughs to provide support where a statutory duty is owed
- how they will provide services to all parts of London in ways that extend beyond premises-based activities (for example, satellite provision, hub-and-spoke, outreach services, remote and online services)
- how they will achieve the outcomes included in the specification and how they will evaluate the impact of their work in relation to achieving the aim of the programme - to reduce homelessness and domestic and sexual abuse
- a multi-agency approach, with effective relationships and referral mechanisms to and from local services (for example, local authorities, local voluntary sector organisations, community organisations, the NHS and other health services, housing providers, the Metropolitan Police Service)
- how they will actively involve people with lived experience in decision making processes, and review and adapt services in response to feedback from people who have accessed their services

- how service delivery can be adapted and continued, at short notice, in response to government advice in relation to local, national or global emergencies
- how culturally responsive approaches to serving London's diverse population will be built into proposed services
- how proposed services will meet the requirements of the Equality Act 2010 (how services will be responsive to the needs of people with protected characteristics).

## **Complementing local and regional provision**

London Councils is the collective of local government in London. Where shared ambitions are developed, agreed, championed, and delivered at London Councils by members working together. Where boroughs speak as one and collaborate with the government, the Mayor of London, the London public sector, the third sector, business, and other key UK and international cities.

One of the key principles of the Grants Programme is only services that are best delivered at a pan-London level, and that complement local services, should be delivered through the programme.

Applicants will be expected to demonstrate how they will complement local provision throughout the life of the grant and build relationships with MOPAC commissioned Safe Accommodation services (under Part 4 duties of the Domestic Abuse Act) as they are mobilised, including creating referral routes and links with pathway co-ordinators and borough housing IDVAs to support survivors across their journey through the system, including moving on from refuge.

## **Monitoring and reporting**

Successful organisations will need to have robust tracking and reporting systems in place. Organisations that intend to lead a partnership will need to ensure that systems count people accessing support across the partnership once, only, for monitoring and reporting purposes.

In the context of the General Data Protection Regulation (GDPR), successful organisations will be data controllers and will be accountable for the quality, integrity, and protection of their data.

***Monitoring requirements will be considerable, particularly for partnerships.*** Borough level reporting will be required, and successful applicants will need appropriate evidence-based tools and systems in place to demonstrate a strong, direct association between the support that is delivered, and the outcomes claimed. Applicants need to factor systems capability, capacity and administration into their costs.

Standard reporting will need to be completed through an online portal. Reporting will need to be completed and submitted on a quarterly basis to meet the requirements of the Grants Committee. Additional annual reporting will also be required.

Quarterly performance information will feed into a 'Red, Amber Green' (RAG) rating system, which will be used to report progress to the Grants Committee and trigger performance improvement interventions.

From time to time, other information will be required from successful organisations, for example, annual audited accounts, confirmation of insurance renewal (e.g., employer's liability), case studies, information to support ad hoc queries from boroughs and Grants Committee members.

A nominated London Councils officer will provide support and challenge to successful organisations, review monitoring returns and other information/reports, and conduct monitoring visits, either virtually or in person.

London Councils will test and validate its approach to monitoring throughout the life of the grant. This will start at the pre-agreement stage, where London Councils will explore what information successful organisations can provide from their own reporting systems, whether there is alternative information that might be gathered more cost-effectively and how we assure the reliability of the information that London Councils asks for.

Whilst London Councils will specify services and outcomes at the beginning of the programme, applicants can propose bespoke outcomes at the application stage, particularly for specialist services. The programme will be reviewed annually, and delivery partners can recommend the development of other outcomes with the grants team as part of this review.

Annual reviews will also take account of emerging developments from the work that the boroughs and strategic partner undertake. The annual review process is designed to ensure that the programme takes account of a changing environment and to provide grants partners the space to innovate and take a flexible approach to shaping services, whilst retaining a focus on the impact we want to achieve.

When determining the impact of outcomes, the focus will be on the experience of people being supported by the service, the experience of local authorities (for example, ease of referring into the service), and how well the project has connected to and supported existing local provision.

## **Service Specification: Emergency Specialist Refuge Provision**

### **Indicative Budget**

**£840,000 per annum**

**TOTAL: £2,520,000**

Funding is subject to annual renewal based on continuing availability of resources and compliance with grant conditions.

### **Service aim - what we want to achieve with your help**

To reduce immediate danger to life for victims and survivors and to support them to rebuild their lives and gain independence. To provide support to victims and survivors whose needs may not be met through mainstream accommodation.

### **Services - the types of services we want to fund and the people we want you to help**

Emergency specialist refuge/safe accommodation for people experiencing sexual violence, exploitation and trafficking, or domestic abuse, with accompanying support.

Services should be holistic and tailored to the needs of the survivors. Support services provided to survivors in safe accommodation may include, but are not limited to:

- risk assessment and safety planning
- in-house advice services or support to access external advice, including housing advice, financial and debt advice, immigration advice, employment advice and legal advice
- support and advocacy for survivors when working with other services, such as housing, health, social services, the criminal justice system, and the family courts
- emotional support, therapeutic support and counselling for survivors
- support to build life skills and independence
- family support, including therapeutic support for children and young people
- specialised support appropriate to the needs and experience of survivors, such as substance misuse support, support for those exiting sexual exploitation and prostitution
- support to move on from safe accommodation/refuge into longer term settled accommodation.

The service is for victims and survivors who need to access emergency specialist refuge/safe accommodation and who may have complex support needs.

Services should demonstrate how they will provide specialist support for victims and survivors who have multiple/complex needs or are currently underserved by safe accommodation provision (as identified in the needs analysis), such as:

- disabled people, including people with mobility impairments and people with learning disabilities
- people with no recourse to public funds and/or precarious or insecure immigration status
- LGBTQ+ people
- Black, Asian and racially minoritised people
- women and men at risk of or experiencing sexual exploitation
- older people
- children and young people (including families/individuals less likely to be placed in refuge, such as parents with three or more children, mothers with adolescent sons, girls aged 16-17 referred alone)

- victims and survivors experiencing multiple disadvantage or high complexity of needs, including complex mental health problems, substance misuse and contact with the criminal justice system.

### **Minimum service provision**

- a minimum of two bed spaces must be accessible for people with mobility related disabilities
- a minimum of two bed spaces should be available to victims and survivors with no recourse to public funds

### **Outcomes**

#### **People can make safe choices and survivors experiencing domestic or sexual abuse are able to leave dangerous situations (supporting a reduction in domestic abuse and sexual violence over time)**

- Number of people experiencing greater feelings of safety
- Number of people with a safety plan
- Number of people with continuing support to sustain new lives.

#### **People rebuild their lives and move to independence**

- Number of people who can rebuild their lives and move to independence (demonstrated through recognised evidence-based tools for measuring and supporting change over time)
- Number of people who move on from refuge accommodation in a planned way
- Number of people accessing specialist support (for example, immigration advice, legal advice, mental health support, substance misuse support - types of specialist support to be determined as bespoke outcomes during grant agreement stage)
- Number of people with improved mental health
- Number of people with more stabilised immigration status

#### **Domestic or sexual abuse is prevented or reduced - professionals can access specialist and additional support for people at risk/affected by domestic or sexual abuse**

- Local authority officers and local IDVAs/ISVAs can access additional support to wrap around existing services, or make referrals into the service

### **Bespoke Outcomes**

A range of specialist services addressing specific needs are likely to be commissioned through this strand. Bespoke outcomes will be agreed during the grant agreement process and applicants are encouraged to suggest bespoke outcomes.

### **Specific requirements of this strand**

#### **Applicants must:**

- have a track record of effective delivery of emergency specialist refuge provision
- be able to demonstrate an understanding of local safeguarding frameworks
- ensure that counsellors are accredited and registered with the British Association for Counselling and Psychotherapy (BACP)
- ensure the service complies with a specific quality standards framework (for example, the Women's Aid National Quality Standard, Imkaan Quality Standard)

- ensure that staff who will undertake advice work for people with no recourse to public funds and people with insecure immigration status are OISC registered to the appropriate level OR that agreed referral plans with a specialist immigration advice partner are in place
- demonstrate that delivery will support the work of the Mayor of London to reduce violence against women and girls, including a commitment to aligning and working with safe accommodation support services commissioned under Part 4 duties of the Domestic Abuse Act
- demonstrate that they can fulfil the general requirements.

### **Developing the Service**

Over the course of the grant, we expect the provider to build relationships with MOPAC commissioned Safe Accommodation services (under Part 4 duties of the Domestic Abuse Act) as they are mobilised, including creating referral routes and links with pathway co-ordinators and borough housing IDVAs to support survivors across their journey through the system, including moving on from refuge.

## Application Schedule and Process

### Application Schedule

	Start	End
Application Window	01/12/2022	13/01/2022 (12pm, noon)
Preliminary due diligence	05/12/2022	15/01/2023
Application scoring	16/01/2023	18/01/2023
Moderation	19/01/2023	
Programme panel	20/01/2022	
Right to reply window	21/01/2023	03/02/2023
Second-stage due diligence	20/01/2023	27/01/2023
Right to reply responses/actions	04/02/2023	05/02/2023
Award approval	06/02/2023	
Award Notification	06/02/2023	
Pre-Agreement Workshop (see <i>Award - formal agreement</i> , page 22)	09/02/2023	
Pre-agreement Meetings	09/02/2023	
Pre-agreement Actions	To be completed by 3 March 2023	
Funding Agreements Signed	On completion of pre-agreement actions	
Advance Payments	On receipt of signed agreement	
Programme Delivery Commences	1 April 2023	

### Conflicts of interest

If you are aware that applying for funding may give rise to a potential conflict of interest, you **MUST** inform London Councils **before** you apply. Generally, conflicts might occur if individuals have a direct or indirect financial interest, non-financial or personal interests, competing loyalties between an organisation they owe a primary duty to and/or some other person or entity. For example, you are related to an elected member or staff officer of London Councils, or you have privileged information about the organisation that places you at an unfair advantage over other organisations in the application process.

## **Required information**

Organisations wishing to apply for funding to deliver a service will need to complete an application, which will include:

- a series of questions that are relevant to the service specification and the general requirements for the programme
- a budget template for the proposed service for the life of the grant
- a three-year delivery plan template
- a risk register template
- a request for reference details (two local authority referees).

Applicants will also need to supply information to enable London Councils to undertake legal and financial due diligence

A summary of all applications will be presented to the London Councils Grants Executive Committee in January 2023 and these summaries will be published on the London Councils website.

Please be aware that the information submitted to London Councils may be subject to a request for information under the Freedom of Information Act 2000.

## **Assessment criteria**

Applications will be assessed against the requirements set out in the relevant specification. Experience, quality, cost and value for money will also be considered.

Aspects of the application which centre on governance, financial stability and management (including management of partnerships) will be assessed by London Councils officers as part of second stage due diligence. Organisations that do not supply required information may fail the application stage.

Each application will be independently assessed by two officers, using a scorecard to support objective consideration. These independent assessments will be moderated (using a formula) to arrive at a single assessment score.

The highest scoring applications that meet the requirements of the specifications will be presented to a Programme Panel. The Programme Panel will not assess/re-assess individual applications. It is responsible for ensuring that the project(s) proposed for award of grant offers a cohesive service that meets the principles for pan-London grants, can add value, enhance the services that Londoners and boroughs have available to them, and is within the available budget.

The combination of scoring and panel assessment may result in recommendations to Grants Committee Executive that are not solely based on the highest application scores.

Awards to more than one applicant may also be considered, where it is deemed that a joint or complementary service will better meet the requirements of the service specification and the programme in the round.

Following the panel meeting, applicants that will not be recommended for the programme will be advised and will have 10 working days to submit a right to reply. The right to reply procedure allows organisations to highlight where they consider that assessors have misinterpreted or overlooked information, or incorrectly applied the published criteria for assessment.



## **Award - approval**

The outcome of the assessment process will be reported to Grants Committee Executive, along with recommendations about potential awards.

Recommendations for funding will be subject to available resources i.e. the package of applications cannot total more than the budget available.

Final approval on the package of funding rests with the Grants Committee.

Organisations will be notified of Grants Committee Executive decisions within five working days of Committee approval.

Referees will be contacted to provide testimonials (satisfactory references are a pre-condition for award of funding)<sup>51</sup>.

## **Award - formal agreement**

Successful organisations must attend:

- a pre-award meeting – the pre-award meeting provides the successful organisation(s) with the opportunity to talk through their project, and for London Councils officers to clarify roles and responsibilities, discuss detailed delivery plans, outline conditions of grant, agree the rhythm of monitoring visits, and agree any actions that need to be completed before the funding agreement<sup>52</sup> is signed
- where a partnership is undertaking delivery, a workshop – a group session for the successful organisation(s), and their partners, to discuss the detailed requirements for the programme (included in the Programme Handbook); borough officers are also invited to attend the workshop so organisations can discuss local needs and tailor plans for delivery

It is a precondition of funding that the successful organisation(s) attends a pre-award meeting and, where relevant, a workshop. Applicants are advised to provisionally hold dates in their diaries (see above schedule for dates).

## **Application deadline and submission arrangements**

Proposals must be submitted, electronically, by **12pm on Friday 13 January**. The application form and associated documents are available on the London Councils website [LINK].

If you have any queries regarding the prospectus or the application process, please email your question(s) to [funding@londoncouncils.gov.uk](mailto:funding@londoncouncils.gov.uk).

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<sup>52</sup> Organisations will be issued a grant agreement, in accordance with the Law of Trust, which governs grant giving