



All-Party Parliamentary Group on Sexual Violence report into the Funding and Commissioning of Sexual Violence and Abuse Services 2018

Foreword

We are living in a time where more victims and survivors of rape, sexual violence and sexual abuse are choosing to speak out about their experiences. But many can't access the specialist support they want and need. There are currently over 6,300 adults and children, predominantly women and girls, on the waiting lists of Rape Crisis member Centres and the network has seen a 17% increase in individuals accessing support in the last year.¹ Correspondingly, there was a 15% rise in the number of rapes reported to the police last year.²

Small, specialist organisations are often most able to reach those hidden from view but, while they would never want to turn anyone away, they are struggling to cope with unprecedented demand. In our All-Party Parliamentary Group (APPG) sessions, we heard about short-term and annual contracts, organisations having to use reserves to top up under-priced contracts and retain staff, and having to compete for funds with much larger, generic organisations with little track record of specialist sexual violence and abuse service delivery.

It is not a level playing field. Most worryingly, we heard that these dedicated services are not able to provide the support they know victims and survivors want and need. We need to ask ourselves why it is that in this period of heightened awareness, and with a stated Government commitment to support those who come forward, we cannot ensure that help is available.

As Chair of the All-Party Parliamentary Group (APPG) on Sexual Violence, with its focus on the funding and commissioning landscape of specialist sexual violence and abuse services across England and Wales, I am deeply indebted to the victims and survivors who have told us their stories and grateful for the time that stretched services across the country have given to share their expertise and challenges. We would also like to thank all those who gave evidence to the APPG

sessions, including senior representatives from NHS England, the Ministry of Justice, the Association for Police and Crime Commissioners and Lloyds Bank Foundation for England and Wales, together with Victoria Atkins MP Parliamentary Under Secretary of State for Crime, Safeguarding and Vulnerability.³ We also want to extend a special thanks to Fern Champion for her evidence. Lastly, we thank Rape Crisis England & Wales for providing the Secretariat.

We have been heartened by the engagement on all sides to seize opportunities for improvements, which aim to put survivors at the heart of ambitious new plans. We know there are good models of joined-up working, where victims and survivors can more easily navigate the services they need, but regrettably the lack of informed commissioning practice means significant challenges remain for specialist services and the victims and survivors they support. The strict criteria around the use of some funding for specific types of violence and abuse, such as for child sexual exploitation or for adult survivors of childhood sexual abuse, does not always mirror the multi-faceted experiences of victims and survivors whose lives are not compartmentalised along funding lines. We need a more person-centred, holistic approach.

As funding for sexual violence and abuse services is increasingly devolved to a local level, it is imperative the Government takes strategic oversight of the implementation of national frameworks and commissioning standards, along with continuing to provide ring-fenced funds for this area at a national level. Without these safeguards, the specialist sexual violence sector faces an uncertain future. We owe it to all victims and survivors to make sure they can access properly funded specialist services. Only this way can we make a reality of the Government's commitment to ensure that 'victims get the help they need when they need it'.⁴

Sarah Champion MP

¹ Rape Crisis England & Wales website, Annual Members Survey 2017-18

² Crown Prosecution Service VAWG report 2018

³ Speakers at APPG oral evidence sessions: Fern Champion, Survivor; Andrea Perrett, Rape Crisis Tyneside and Northumberland; Gurpreet Virdee, Women & Girls Network; Vivienne Hayes, Women's Resource Centre; Lucila Granada, Latin American Women's Rights Service; Duncan Shrubsole, Lloyds Bank Foundation; Catherine Hinwood, Ministry of Justice; Kate Davies, NHS England; Dame Vera Baird QC, Association of Police and Crime Commissioners; Victoria Atkins MP.

⁴ Violence against Women and Girls Strategy 2016 – 2020

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522166/VAWG_Strategy_FINAL_PUBLICATION_MASTER_vRB.PDF

Executive Summary and Recommendations

Sexual violence and abuse support services have been described as at crisis point. Need and demand for their specialist services from victims and survivors of all forms of sexual violence and abuse are at unprecedented levels and continue to rise year on year. Many Rape Crisis Centres and other specialist providers operate waiting lists for their services and some have had to take the difficult decision to close their waiting lists. It can take a lot of courage to reach out for support and services describe it as 'agonising' and 'soul-destroying' to not always be able to provide this.⁵

Funding and commissioning opportunities that services are able to access vary widely across the sector, partly as a result of the agenda of devolving funds to local levels. Many services feel they survive on a 'hand to mouth' basis, with the prevalence of short-term grants and contracts meaning too much time and energy is diverted to sourcing the funds for survival each year. Difficult decisions frequently have to be made to make experienced staff redundant or reduce or suspend services. Some services report pressure to merge and/or stop providing dedicated single sex services from Commissioners who do not understand their Equality Duty responsibilities⁶ and prefer to issue larger contracts to generic providers with minimal track record, despite the cost effectiveness and considerable expertise and experience of smaller, specialist providers.

Government must resolve the evident contradiction between their move to local commissioning to achieve tailored, locally appropriate solutions, and the pressure on local Commissioners to let large service contracts to single, generic providers in order to deliver savings through economies of scale.

As it stands the Government's commitment in the 2016 Violence against Women and Girls (VAWG) strategy that by 2020 'no victim will be turned away' will not be achieved. But this is not an insurmountable problem. Specialist third sector organisations

provide high quality services at a low cost to the state. With political will and substantial investment in a long-term, sustainable funding model for these organisations, access to specialist, holistic services for all sexual violence and abuse victims and survivors, whenever they need and want them, could become a reality.

To this end, and to prevent the destruction of the specialist sexual violence and abuse sector, the APPG makes the following recommendations. We add a note of caution, however, as we know that these points have been made in various forms on many occasions previously. The time has passed for recommendations alone and has moved to a point where urgent action is required.

1. For the Government to create a statutory right to specialist sexual violence and abuse support services, meaning all victims and survivors are legally entitled to these services as and when they choose to access them, with sustained, dedicated funding designated to achieve this.
2. For the Government to set national standards on levels of specialist sexual violence service provision per head of the population, drawn from the Istanbul Convention. This will create a benchmark from which we can measure the minimum level of service offer that should be provided across the regions of England and Wales, and the increased level of investment required to achieve it.
3. For the Ministry of Justice pilots on devolved commissioning and any future funding devolution to Police & Crime Commissioners (PCCs) to include ring-fenced funding for sexual violence and abuse support services so that the resources of these services are not subject to political whim and favour.

⁵ Written evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

⁶ 'A service provider is allowed to provide separate services for men and women where providing a joint service would not be as effective and is objectively justified' Equality Act 2010: Summary Guidance on Services, Public Functions and Associations, Equality and Human Rights Commission, 2014
<https://www.equalityhumanrights.com/sites/default/files/equality-act-summary-guidance-on-services.pdf>

4. For the Ministry of Justice pilots on devolved commissioning to require PCCs to develop and publish, in partnership with Clinical Commissioning Groups (CCGs), Local Authorities and third sector specialist organisations, a 'Victim's Promise' document, setting out the needs of local victims and survivors, the availability of services and the local strategy to improve accessibility. This will drive better coordination of local resources, encourage accountability and provide transparency to victims and survivors.
5. For the Government to identify a focal point to have specific oversight and responsibility for the strategic direction of support services to victims and survivors of sexual violence and abuse, and one which will have the 'teeth' to ensure compliance with national commissioning guidance.
6. For Government departments, PCCs, and the health sector responsible for funding and commissioning specialist services to adhere to minimum contract terms of three years, ideally five. This must be matched by longer budgets for Commissioners e.g. an end to twelve-month funding for PCCs.
7. For a strong audit function to be established to enable the Government to better measure and oversee the spending of devolved funds on specialist sexual violence and abuse services, via an organisation such as the National Audit Office.
8. For the Government to issue clear guidance on the provision of women and girls only services as part of their strategic oversight, strongly directing funders and Commissioners on their Equality Duty obligations.

Introduction

The All-Party Parliamentary Group (APPG) on Sexual Violence is chaired by Sarah Champion MP. It was established in recognition that sexual violence and abuse services are often marginalised within the broader Violence against Women and Girls (VAWG) agenda. It also recognised that specialist sexual violence and abuse services were seeing significant increases in demand for their services at a time when resources were shrinking. The aim of the APPG is to explore in more detail these current challenges and to make recommendations for how the situation can be improved.

In June 2018 the APPG launched a call to specialist sexual violence services for written and oral evidence on the challenges of the current funding and commissioning landscape. Two oral evidence sessions were held in Parliament on 17th July and 17th October 2018 and a further 19 written responses

were received. Survivors also gave moving first-hand accounts of their experiences.

The APPG would like to thank everyone who submitted evidence to the inquiry, particularly those survivors who told us their stories.

Rape Crisis England & Wales has provided the Secretariat for this APPG. Rape Crisis England & Wales is the national sexual violence and abuse charity and umbrella body for the network of 44 autonomous Rape Crisis Centres. Members have been providing frontline specialist, independent and confidential support services for victims and survivors of all ages who have experienced any form of sexual violence at any time in their lives since 1973. This report was written by Gilly Green and Jane Skeates for Rape Crisis England & Wales.

Background and context

It is estimated that 1 in 5 women have experienced sexual assault in their adult lives (compared to 4% of men).⁷ In the last year alone, 3.1% of all women were victims of sexual assault or rape (compared to 0.8% of all men).⁸ The vast majority of victims (86%) do not report their experiences to the police according to the Crime Survey for England and Wales.⁹ During 2017-18 Rape Crisis specialist services were accessed by 78,461 individuals (including women, men and children) - an increase of 17% from 2016-17.¹⁰

In the same year Rape Crisis Centres across the network responded to 179,000 helpline calls.¹¹ In 2017-18, Sexual Assault Referral Centres carried out around 10,000 forensic medical examinations following this type of crime. In the year ending September 2017, police recorded 138,045 sexual offences, the highest figure on record. All frontline sexual violence and abuse services, which include NAPAC, Survivors Trust, Survivors UK and Safeline, have seen an unprecedented rise in demand for their services in recent years, and this shows no sign of slowing.

This rise is understood to be due in part to the increased public profile of sexual abuse, rape, and all forms of sexual violence. Campaigns such as #MeToo and Time's Up, a series of high-profile cases of childhood sexual abuse and child sexual exploitation, as well as the Independent Inquiry into Child Sexual Abuse (IICSA), have generated significant media attention and public debate. For the first time in its history, in September 2018 the Nobel Peace Prize¹² was awarded to recognise pioneering work in this area.

Governments, local Commissioners and other funders acknowledge the essential need for services to support victims and survivors, yet the impact of

austerity, devolution of commissioning responsibilities and changes to commissioning practice have led to significant challenges for the specialist organisations set up to support them.

Overall funding received by specialist sexual violence and abuse services has in no way kept pace with, and continues to be completely disproportionate to, the high levels of demand they face. This has created wide inconsistencies in the provision of services across England and Wales.

Evidence of this is that at end of the financial year 2017-18, there were 6,355 victims and survivors waiting to access support from Rape Crisis Centres, with waiting lists for counselling ranging from 3 to 14 months,¹³ and a number of services have had to close their waiting lists altogether in the absence of funding to clear them within the period of the contract. The impacts on victims and survivors who have been subjected to sexual violence and abuse and then are unable to access specialist support cannot be overstated and must not be lost sight of.

I very rapidly crashed through rock bottom and found myself unable to go to work, or even leave the house. I was experiencing severe migraines which left me incapacitated as a result of stress and lack of sleep. I have experienced night terrors since my attack, and these started to become more frequent. I also started to have flashbacks during my waking hours.

Fern Champion, Survivor¹⁴

⁷ ONS (2018) Sexual offences in England and Wales: year ending March 2017 (<http://bit.ly/2PVUw7U>)

⁸ Ibid

⁹ Ibid

¹⁰ Rape Crisis England & Wales website 2018

¹¹ Rape Crisis England & Wales website 2018

¹² Denis Mukwege and Nadia Murad, Nobel Peace Prize winners 2018

¹³ Rape Crisis England & Wales Funding and Commissioning Landscape survey for the APPG on Sexual Violence – the Funding Landscape for Sexual Violence Services 2018

¹⁴ Oral evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

¹⁵ See Appendix 1 for data on centralised government funding for national helplines

Additionally the national Rape & Sexual Abuse helpline (delivered by Rape Crisis South London) supporting victims and survivors of violence and abuse does not receive any dedicated funding from national Government.¹⁵

What is clear is that while there may be some good models of joined-up local commissioning that can be commended, the overall funding environment is highly challenging and has serious implications for the future of specialist services.

The current lack of funding has led to our huge waiting list. Women with debilitating trauma symptoms (nightmares, flashbacks, panic attacks etc) are left unsupported and often isolated because their shame precludes them from talking to others.
Centre Manager, Rape Crisis Centre in the South of England¹⁶

The value of specialist sexual violence and abuse services

Specialist sexual violence and abuse services predominantly centre around a therapeutic response, often through the provision of medium- to long-term counselling. They work with victims and survivors who have experienced sexual violence and abuse at any point in their lives. Often small, with highly committed expert staff, many make considerable use of volunteers. In his evidence to the APPG.

Duncan Shrubsole, Director of Policy, Communications and Research, Lloyds Bank Foundation for England and Wales said of specialist services:

“Typically, they welcome people in, respond to the needs as they present not just as the contract requires, and provide the depth, range and length of support that person needs..... there’s also a really key role to play about the human nature of the staff, volunteers, and other specialists involved. Such a charity often reaches people that others can’t, works with them in ways which others won’t and stays engaged with them in ways which others don’t.”¹⁷

With their deep understanding of the needs of victims and survivors, specialist services can also bring significant value in helping identify local needs and the services victims and survivors want.

They engage directly with groups that other agencies fail to reach and listen to, and work in holistic and person-centred ways that are responsive to individual and local contexts.¹⁸

The APPG heard that national and local commissioning trends are having a profound effect on the future of specialist sexual violence services and their role is too often being misunderstood, undervalued or not recognised.

¹⁶ Written evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

¹⁷ Duncan Shrubsole, Lloyds Bank Foundation for England and Wales; oral evidence to the APPG on Sexual Violence: The Funding Landscape Part 2, Understanding the Perspective of Funders and Commissioners

¹⁸ The Value of Small: In depth research into the distinctive contribution, value and experiences of small and medium sized charities in England and Wales, Lloyds Bank Foundation for England and Wales, 2018

Funding and commissioning of specialist services

A range of statutory bodies have responsibility for commissioning local and national services to support victims and survivors of sexual violence and abuse. At the national level, these include the Ministry of Justice, Home Office, the Department of Health and Social Care, and NHS England.

Locally, Clinical Commissioning Groups (CCGs), Police and Crime Commissioners (PCCs) and Local Authorities all have a responsibility to ensure access to services. While the discrete responsibilities of these bodies are clearly set out, they are inadequate and, at best, often applied inconsistently, at worst, ignored.

The constantly shifting landscape, changing relationships and new partnership arrangements contribute to a system where it can be exceedingly

complex for survivors to navigate the system to receive the right help at the right time. With deep cuts to public sector funding, services supporting survivors of rape, childhood sexual abuse and all forms of sexual violence are competing for limited funds, often against larger providers with little or no track record in this highly specialist field.

While different sources of funding are guided by different processes and priorities, there is a growing consensus that the unprecedented growth in demand, coupled with the scarcity of resources, is threatening the very existence of the specialist sexual violence sector, with significant consequences for victims and survivors.

Our efforts to match our available capacity to demand have involved restricting or reducing the number of sessions we are able to offer each client which runs the risk of compromising the effectiveness of the counselling intervention. Our main concern is our ability to continue to provide services at a level to meet the need that exists in our region, and for long enough to help our clients to make genuine long-term improvements in their mental health and emotional wellbeing. Sunderland Counselling Service¹⁹

¹⁹ Sunderland Counselling Service, Written evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

National Leadership

The UK Government has for the first time published a cross-government Victims Strategy²⁰ setting out new policy and bringing together existing funding commitments made by various government departments. The strategy aims to co-ordinate and combine funding and increase impact for victims, who should find it easier to navigate help through better integration between statutory and non-statutory services.

Two areas of the strategy overseen by different departments make reference to their commitments to specialist sexual violence services:

- Fund national rape services {through the Rape Support Fund} for a minimum of two years and explore further local commissioning of services by PCCs to improve support for victims of sexual violence.

- Increase spending from £31m in 2016/17 to £39m in 2020/21 to improve services and pathways for survivors and victims of sexual violence and abuse who seek support to and from Sexual Assault Referral Centres.

While specialist organisations welcome the opportunity to improve referral pathways for victims and survivors, the APPG heard that in the current climate, many were struggling to get their voices heard and their expertise recognised at a local level, and thus had little confidence that, without strong national leadership around minimum standards and commissioning guidance, these potential opportunities were within their reach. We are also aware of a confusion for services in Wales as to how Westminster and the Welsh Government interact in relation to the responsibility for funding sexual violence and abuse services.

Home Office

The Home Office has previously part-funded Independent Sexual Violence Advocates (ISVAs). However, this funding ceased in 2016 with the expectation that Local Authorities and PCCs would take over the funding of the specialist posts. Our understanding is that this ISVA funding was pooled into the £17 million 'Transformation Fund', which was awarded to 41 bids across 3 years until 2020.

This fund focused on new and innovative projects that sought to 'transform' rather than on much-needed core delivery. Additional pots of money managed by the Home Office, or by the Department for Digital, Culture, Media and Sport tend to follow this pattern and do not work towards creating sustainable long-term funded services.

The Tampon Tax Fund, announced in 2015 (£15m), was created to fund women's services. However, in 2018 only two in 10 charities awarded funding from this pot were specialist women's organisations.²¹

The Trusted Relationships Fund was specifically cited as key to tackling childhood sexual exploitation by the Home Secretary in his inaugural speech on sexual violence²² earlier this year, but it does not appear to have reached any specialist Rape Crisis services. The Home Office funds a number of national helplines relating to violence and abuse.²³

The National Domestic Violence Helpline received £500,000 whereas the national Rape & Sexual Abuse helpline has received a one-off £10,000 contribution via Rape Crisis England & Wales. This also serves to demonstrate the marginalisation of sexual violence that occurs within VAWG.

²⁰ <https://www.gov.uk/government/publications/victims-strategy>

²¹ Department for Digital, Culture, Media & Sport (26 March 2018) 'Women and girls set to benefit from £15 million Tampon Tax Fund' (<http://bit.ly/2MQru7y>)

²² <https://www.gov.uk/government/news/tackling-child-sexual-exploitation-online>

²³ See Appendix 1

Ministry of Justice - The Rape Support Fund

The Rape Support Fund (RSF) has been a reliable cornerstone of core support to specialist sexual violence services since 2011. However, from April 2019, the Ministry of Justice (MoJ) will pilot the devolution of this fund, and whilst the Government's commitment to local commissioning remains firm, the MoJ recognises that more time is needed before a national roll-out. Consequently, the MoJ has announced the Rape Support Fund will continue via a national competition for a further three years, with criteria that include the ability to demonstrate how organisations will address increased demand.

The APPG heard that some organisations are concerned about the prospect of intensified competition for these funds with no level playing field, and although the MoJ has confirmed an overall 10% increase to the fund, this may not result in increased income for specialist services as a result.

Criteria for how the pilot will be judged are currently unknown. However, the likely direction of travel to full devolution to PCCs (where funds may no longer be ring-fenced) is causing significant concern:

“We would probably have to compete for it, lose part of it, have other contract values reduced – we would close.”

Centre Manager, Rape Crisis Centre, North of England²⁴

While some PCCs show a welcome commitment to funding sexual violence and abuse services at the local level, this is not guaranteed:

“The PCC is a political office... that may not prioritise sexual violence above other issues.”

Centre Manager, Rape Crisis Centre, Midlands²⁵

Others reported fears that if the Rape Support Fund is devolved, Police and Crime Commissioners (PCC) would not pass on the funds, believing that they already contribute to local services:

“Our PCC has indicated we would receive no funding from them for our core counselling and support line services.”

Centre Manager, Rape Crisis Centre, North of England²⁶

Conversely, if successful some agencies feared that receiving such a high proportion of their funds from their PCC could create an overreliance on one source of funding, making organisations vulnerable to the decision-making of a single source. This is especially worrying given the widespread recognition that in the current climate, organisations should be diversifying their sources of funding, not shrinking them, so they can manage the risk of unexpected shocks and reductions in support.

“All our funding eggs would be in one basket - not a good funding model.”

Centre Manager, Rape Crisis Centre, South of England²⁷

In summary, when asked about the likely impact of devolving the Rape Support Fund to Police and Crime Commissioners, one member simply responded:

“Devastating”

Centre Manager, Rape Crisis Centre, Midlands²⁸

²⁴ Written evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

²⁵ Ibid

²⁶ Ibid

²⁷ Ibid

²⁸ www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/sexualoffencesinenglandandwales

NHS England – Sexual Assault Referral Centres

In 2013 under the Health and Social Care Act, NHS England took on responsibility for commissioning Sexual Assault Referral Centres (SARCs). The NHS Sexual Assault and Abuse Service (SAAS) board has responsibility for implementing the additional allocation of funding through the Victims Strategy. There are currently 47 SARCs, which provide immediate help and support to victims of rape and sexual assault and focus on getting forensic evidence, creating a case for the prosecution and helping the victim co-operate with the criminal justice process. They also refer victims on for long-term counselling support, if needed. The aim is for SARCs to work in partnership with a range of local stakeholders, including the third sector, to provide the best possible access and referral pathways for victims and survivors.

SARCs play a critical role in supporting the victims who have reported their sexual offence. However, this constitutes a small minority of all victims and survivors – Government figures show that around 83% did not report their experiences to the police. www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/sexualoffencesinenglandandwales.

Despite this, SARCs receive the disproportionate share of funding. The apparent prioritisation of funding to SARCs over and above other types of support has led to a perceived hierarchy of care. Those who choose not to access a statutory service, or fall outside of the more restricted remit of SARCs, are marginalised by funding and commissioning practices.²⁹ In 2017-18, NHS England reported that SARCs received £31million and delivered around 20,000 'attendances',³⁰ 10,000 of which were Forensic Medical Examinations.³¹ Funding to organisations within the Rape Crisis network, which

provided over 650,000 sessions of specialist support to more than 78,000 individuals in 2017-18, totalled around £20 million that year.

There is a clear need for SARCs to receive significant levels of funding, but the question is when will community-based, frontline specialist services receive a matched level of investment to meet the needs of victims and survivors who choose to access these services?

“ This creates the paradox that sexual violence services are therefore rarely commissioned to provide the kind of support most survivors, especially those with multiple and complex needs, need³² ”

Changing Lives

While in theory the commitment to involving the third sector may offer new opportunities for specialist organisations, evidence presented to the APPG indicates there would need to be significant shifts in how the specialist sexual violence and abuse sector is perceived by health and justice Commissioners.

Their detailed understanding of survivors' needs is frequently disregarded, and they are excluded from key strategic decisions. The APPG heard that there is an increased focus on a medicalised and clinical response, with more SARCs taking over ISVA contracts. This raises the question of the extent to which a service based within a statutory setting can be deemed independent. This push towards the medical model is despite evidence that victims and survivors most benefit from independent, community-based, long-term and non-medicalised services.

²⁹ Office for National Statistics <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/compendium/focusonviolentcrimeandsexualoffences/yearendingmarch2015/chapter1overviewofviolentcrimeandsexualoffences>

³⁰ Lifetime Mental Health Care for Sexual Assault Victims, NHS England, 4th June 2018

³¹ <https://www.england.nhs.uk/2018/06/lifetime-nhs-mental-health-care-for-sexual-assault-victims/>

³² Changing Lives, Written evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

Local Commissioning – PCCs, CCGs and local authorities

“With good commissioning, our clients benefit from experienced staff and short waiting lists. Poor commissioning means we will be unable to retain experienced staff, waiting lists will soar and services will be cut.”

Centre Manager, Rape Crisis Centre, South of England³³

With budgets increasingly devolved from Central Government, locally elected Police and Crime Commissioners (PCCs) have ever-growing commissioning responsibilities for victims of crime, including victims of sexual violence and abuse. Clinical Commissioning Groups (CCGs) have responsibility for commissioning mental health services, including from the third sector. Local authorities have a range of responsibilities and commission some services from specialist voluntary sector agencies.

In her evidence to the APPG, Catherine Hinwood from the MoJ stated that ‘local commissioning is key to unlocking further improvements and providing a better service to victims’.³⁴

Good local commissioning requires Commissioners to put victims and survivors at the centre of service delivery, consult widely including with survivors and specialist service providers, undertake a joint strategic needs assessment, map local provision and identify opportunities for joint commissioning across PCCs, public health is located within local authorities, and therefore CCGs and Local Authorities. Good commissioning is also understanding that value for money is not just about financial cost – it is also about recognising the value of social, health and cultural outcomes as permitted through the Most Economically Advantageous Tender (MEAT) guidance within the EU Procurement Directives.³⁵

The Women’s Resource Centre has calculated that the social value generated by women’s services is

five to 11 times greater than the amount of money invested in them.³⁶

In recognising the growing responsibilities now placed on PCCs, Dame Vera Baird told the APPG it was vital ‘PCCs made well-informed as well as technically sound commissioning decisions’ and to this end Commissioners can share practice, along with invited specialists in the PCC Portfolio Group. She also said, ‘devolution is a good thing, but it also does put a burden on 42 individuals and thus there is an overwhelming need for national standards and ring-fencing’.

Through written and oral evidence, the APPG heard about the commissioning experiences of specialist organisations including with PCCs, Local Authorities and CCGs.

Understanding survivor needs

The lack of understanding of survivor needs in the commissioning of services was raised many times in the written evidence to the APPG. Commissioners under pressure are less likely to make dedicated time to develop relationships with providers, to share local knowledge and bring survivors, who are experts in their own lives, into the process. This leads to poor commissioning practice with uninformed assessments of need, inappropriate tender specifications, and smaller specialist services getting lost and falling through the cracks between Health, Social Care and Justice.

“Services are provided that meet commission briefs rather than genuinely respond to the needs of victims and survivors.”

Centre Manager, Rape Crisis Centre, South of England.³⁷

³³ Written evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

³⁴ Catherine Hinwood, Head of Victim and Witness Policy, Ministry of Justice Oral evidence to the APPG on Sexual Violence: The Funding Landscape. Part 2 Understanding the perspective of Funders and Commissioners

³⁵ EU Public Procurement legislation, Most Economically Advantageous tender

³⁶ WRC (2011) Hidden Value: Demonstrating the extraordinary impact of women’s voluntary and community organisations (<http://bit.ly/2mhfQZ8>) p 6

³⁷ Written evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

“ The funding and commissioning processes impact on survivors’ recovery from sexual violence, their ability to be safe from further abuse, to be in control of their own lives and make positive decisions about their lives. ”

Centre Manager, Rape Crisis Centre, Midlands³⁸

It seems that in many areas where Commissioners are informed about survivor needs this is due to personal relationships:

“ All positive experiences are solely the result of personalities and networks. This is a fragile way to provide services. ”

Centre Manager, Rape Crisis Centre, South of England³⁹

Competitive tendering

Local Rape Crisis Centres report increased competition for funding, and like many other smaller voluntary organisations often end up competing and losing against larger generic providers with no track record in providing specialist services. Larger generic organisations often have dedicated teams of contract and bid writers, more tendering experience and are willing to engage in litigation when unsuccessful in their bids.

“ Part of the reason for the success of large national charities in commissioning processes is that Commissioners prefer the perceived ‘safety’ of procuring services from a larger and ‘more stable’ organisation, particularly when it is a ‘known’ brand. Smaller organisations have felt swallowed up, held to ransom and their work hasn’t been recognised or respected. ”

My experience is that Commissioners are also under significant strain and many have to manage a number of large contracts that they can’t know about in detail, yet we know that good, intelligent commissioning requires the commissioner to work with the specialist provider to produce a reasonable tender and should have detailed knowledge about the issue and the delivery of the contract. ”

Centre Manager, Rape Crisis Centre, South of England⁴¹

In a climate of austerity, Commissioners are under pressure to reduce contract numbers and meet targets. It can seem more costly, complicated and time-consuming to commission small providers rather than larger organisations or consortiums. Services report that the value of a contract frequently does not reflect the value of a service. Reducing costs will impact on the quality of services provided and many specialist sexual violence providers are unwilling to accept that reduction in quality.

As one provider explains:

“ We use reserves to underwrite service costs. ”

Centre Manager, Specialist sexual violence and abuse centre, England⁴²

Another reported:

“ As contracts do not cover the quality of services we wish to provide, {there is} constant pressure to enhance with grant funding - this contributes to false expectation from Commissioners and additional pressure to deliver beyond what the contract covers. ”

Centre Manager, Rape Crisis Centre, Midlands⁴³

Many independent funders are understandably reluctant for their funds to be used in this way.

Competitive tendering results in a race to the bottom on costs to provide services and results in centres having to ‘top up’ their contracts using their reserves. Services working over wide geographical rural areas talk of the increased resourcing required to ensure equality of access to services to allow for the travelling, especially in such economically deprived areas with poor public transport infrastructure. Similarly services spoke of not being able to access funds for provision of services in the languages spoken by their service users and the impact on equality of access that creates.

³⁸Written evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

³⁹Ibid

⁴⁰The Value of Small: In depth research into the distinctive contribution, value and experiences of small and medium sized charities in England and Wales, Lloyds Bank Foundation for England and Wales, 2018

⁴¹Written evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

⁴²Ibid

⁴³Ibid

Absence of provision

In her evidence to the APPG, on 17th July 2018, Dawn Thomas asked:

“ Why are CCGs ignoring the mental health support needs of local victims and survivors of sexual violence and abuse once they are referred to Rape Crisis services by health providers?⁴⁴ ”

Dawn Thomas, Co-Chair, RCEW

The impact of sexual violence on the mental health and wellbeing of women and girls is well documented. The SAAS recognises the ‘devastating and lifelong consequences on mental health and physical and emotional wellbeing’.⁴⁵

Although CCGs have a vital role to play in the commissioning of mental health services, including for psychological therapies for adult and child victims and survivors of sexual violence, it is apparent this is not being realised in budgets. In 2018, just ten CCGs of over 200 provided funding to their local Rape Crisis Centre. The total amount received was approximately £560,000 out of the overall income of £20 million across the network.

“ We are also one of the very few services who received funding from our Clinical Commissioning Group. This took us 2 years to secure. The money was given for 2 and a half years and then the CCG took it back, despite the project originally having the potential to run for 4 years. A project went from 5 days of counselling to 1 day of counselling. However, they continue to be one of our biggest referrers. ”

Gurpreet Virdee, Director of Operations and Development, Women & Girls Network⁴⁷

It will be vital in future that specialist services that provide trauma-informed, longer-term support are properly funded via better joined-up referral pathways to meet these needs, so survivors can receive support in settings in which they feel comfortable.

Pressure to merge

Sexual violence services report a pressure to merge with larger non-specialist providers or with domestic abuse services. In either case, this can and does lead to dilution or loss of vital specialism. The drivers for this approach appear to be efficiency and cost-cutting, but at the expense of the specialist needs of survivors of rape and sexual violence.

“ The ‘integration’ of domestic abuse funding with sexual violence funding has led to a marginalisation of sexual violence support. A fundamental misunderstanding of sexual violence work that continually gets lost in or conflated with domestic abuse. The mindset that sexual violence only happens within intimate partner relationships. ”

Centre Manager, Rape Crisis Centre, South of England⁴⁸

There is also an impact on survivors themselves:

“ Where Commissioners don’t see sexual violence as a priority, there is a parallel process that tells victims they are not important enough to help and reinforces societal myths that the victim is to blame. ”

Centre Manager, Rape Crisis Centre, Midlands.⁴⁹

Short termism

PCCs are awarded annual funding settlements from central government that makes it hard to do anything other than commission annually. Short-term funding leads to a lack of sustainability, staff insecurity and difficulties in developing long-term strategies.

In written evidence to the APPG, one service indicated that 60% of its income was given on an annual basis⁵⁰ and this year-to-year precarious existence was one of the most commonly cited challenges for specialist organisations.

⁴⁴Dawn Thomas Co Chair RCEW, Oral evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

⁴⁵NHS England’s Strategic Direction for Sexual Assault and Abuse Services 2018

⁴⁶Autumn Budget; 2018 Pre Budget-Policy Briefing Women’s Budget group

⁴⁷Oral evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

⁴⁸Written evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

⁴⁹Ibid

⁵⁰Written evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

The annual bidding process leads to:

“ Organisational instability at a time of unprecedented increases in demand for specialist service provision. ”

Centre Manager, Rape Crisis Centre, South of England⁵¹

“ Limited time means we are unable to plan forwards or build services that last. ”

Centre Manager, Rape Crisis Centre, Midlands⁵²

Late decision-making on funding was also highlighted as a difficulty, creating huge uncertainties for staff, who are regularly issued with redundancy notices, which are later retracted when decisions are finally made.

“ We use reserves to underwrite service costs, including staff hours in the first quarter so as not to make staff redundant and give stability of service to survivors. ”

Centre Manager, Rape Crisis Centre, North of England

“ 12-month agreements mean every 31st March is a cliff edge. ”

Centre Manager, Rape Crisis Centre, South of England⁵³

Organisations also gave examples of where commissioning processes and reporting mechanisms were disproportionately onerous for the size of the grant. This not only takes up valuable time for staff but the complexity of application processes may also disadvantage smaller organisations without dedicated fundraising teams.

Gender-neutral services and the loss of women's space

Despite the clarity of the 2010 Equality Act, women's organisations have reported how misunderstanding and misapplication of the Equality Duty has resulted in Commissioners challenging women's organisations on the provision of women and girls only services, including Black and Minority Ethnic (BME) led services for women and girls. The Strategy to End Violence Against Women and Girls 2016-2020⁵⁴ recognised that violence against women is a disproportionately gendered crime, and the National Service Expectations⁵⁵ also expects Commissioners to acknowledge the gendered nature of VAWG. Some Commissioners have recognised the necessity for women's space and stated that being 'gender-informed' and 'gender-specific' was very important⁵⁶.

However, the APPG heard that the pressure to merge services because of austerity, the drive to gender neutrality and a misunderstanding of the Equality Duty, means women-led specialist rape and sexual violence services are facing pressures to make their services available to men.

“ Our PCC said in a public meeting he would 'no longer fund services that weren't open to men. ”

Centre Manager, Rape Crisis Centre⁵⁷

This can lead to organisations being forced to compromise their dedicated women-only space knowing that this will prevent many women from seeking support. A study of women-only services commissioned by the Equality and Human Rights Commission found that for the majority of service users the women-only aspect of the service was important in their decision to attend.⁵⁸ Reasons for this included safety and security, building trust and confidence, peer support and the ability to talk freely about the issues facing them. These were particularly important for ethnic-minority service users.⁵⁹

⁵¹Written evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

⁵²Ibid

⁵³Ibid

⁵⁴Strategy to End Violence Against Women and Girls 2016-2020

⁵⁵VAWG National Statement of Expectations, 2016

⁵⁶Scoping Study: VAWG Services 2018; Connect centre for International Research on Violence and Harm, University of Central Lancashire p50

⁵⁷Written evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

⁵⁸EHRC (2012) The impact of changes in commissioning and funding on women-only services (<http://bit.ly/2MP2qOp>)

⁵⁹Life-Changing and Life-Saving: Funding for the women's sector 2018 report by Women's Budget Group and Women's Resource Centre

While there is a recognition that boys and men also experience sexual violence, and that its impacts are no less devastating, there is a fear that without dedicated male funding, resources will be diluted or diverted from services for women.

In his evidence to the APPG, Martyn Sullivan from Mankind highlighted how current funding is increasingly for mixed sex services and, in recognition of the need for single sex services, called for separate dedicated funding for men's services.⁶⁰

It was deemed vital in submissions that funding for male services was an additional resource rather than taken from a proportion of funds currently or previously spent on supporting women and girls.

Women from Black and Minority Ethnic & wider marginalised groups with additional and complex needs

In her introduction to the second session of evidence for the APPG on 17th October 2018, Sarah Champion MP, Chair of the APPG highlighted the 'additional difficulties felt by BAME organisations – where the impact of austerity, and to be blunt, hostile immigration policies are definitely being more keenly felt.'⁶¹

While all Rape Crisis members provide services to BME women, the Scoping Study: Violence Against Women and Girls' Services 2018 states 'by far the most commonly cited gap in funding and provision was for dedicated BME VAWG services. This included general VAWG provision for BME women but also for specific provision focusing on travelling communities; race and cultural understandings; BME women with disabilities; women with no recourse to public funds; women with immigration issues and women with language barriers.'⁶²

Whilst working in partnership is a crucial aspect of addressing VAWG it is important to acknowledge that partnerships do not always provide positive

experiences for specialist/BAMER organisations. Imkaan states that:

“Increasingly, a key strategy for driving down costs includes the proactive encouragement by Commissioners for smaller organisations to enter into partnership through consortia arrangements. Some felt that partnerships were often more likely to benefit larger organisations who would hold most of the resources but through 'partnering' with smaller BME VAWG organisations be better able to demonstrate equalities based outcomes.”⁶³

Gurpreet Virdee, Director of Operations and Development, Women & Girls Network⁶⁴

However, there are no specific data on services led 'by and for' BME women and Rape Crisis services who have developed dedicated BME projects for BME women who have specifically experienced sexual violence. We keenly await Imkaan's forthcoming report on BME women's and girls' experiences of accessing specialist organisations.

For women with complex or additional support needs, including LGBTQ+ women, disabled women and women involved in prostitution, and those experiencing issues around mental health, drug and alcohol issues, and homelessness, the lack of wraparound specialist support, together with the loss of many mainstream organisations, means that these women have less opportunity to get the specific help they need.

“There are very real and serious gaps for services which support women experiencing or involved in sex work, sexual exploitation and survival sex. The lack of national leadership, strategy or funding for this area of work represents a serious risk to a significant population of women hidden from the view of mainstream sexual violence services.”

Changing Lives⁶⁵

⁶⁰Martyn Sullivan, Mankind, Written evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

⁶¹Sarah Champion, MP Opening remarks, APPG on Sexual Violence: The Funding Landscape. Part 2 Understanding the Perspective of Funders and Commissioners

⁶²Scoping Study: Violence Against Women and Girls Services 2018, Connect Centre for International Research on Violence and Harm, University of Central Lancashire p21

⁶³Imkaan (2015) State of the Sector: Contextualising the current experiences of the BME ending violence against women and girls organisations

⁶⁴Oral evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

⁶⁵Changing Lives, Written evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

Trusts and foundations

Independent Trusts and Foundations play an important role in the funding of rape and sexual abuse services, providing approximately £2 million a year for specialist services.⁶⁶

Many recognise the vital role that smaller, specialist organisations play in their local areas, as well as on the national stage. However, cuts to public funding and the unprecedented rise in demand on frontline services has seen increasing competition for their funds.

Trusts and Foundations have greater flexibility than many other sources of support in how they allocate resources, and can give longer-term grants, including

for core funding. Increasingly they also offer non-financial development support to strengthen the sector. However, they cannot fill the gap left by the cuts to public funding and understandably are reluctant to use their funds to top up underfunded contracts. Anecdotal evidence from specialist organisations suggests that independent funds are important in the diversity of their funding sources, but more could be encouraged to award core funding and fund more existing, rather than new services. Whilst innovation is vital for developing and adapting services, this should not be at the expense of providing core funds for local agencies who know what works.

Summary

The APPG on Sexual Violence has learnt that specialist sexual violence and abuse services are facing serious challenges to their current and future sustainability. All agree that demand for services has risen exponentially but services have not received increased funding to respond to this changing landscape. The APPG heard specialist services that have been historically under-funded are now struggling with the impact of further cuts and difficulties in securing core funding.

It also heard that devolved commissioning, competitive tendering, and short-term contracts are proving difficult for these services to navigate. Services told us of a continued lack of understanding by policy-makers and Commissioners of the value of specialist, women-led services, many preferring instead to adopt a one-size-fits-all approach. Services reported pressures to merge with both generic providers and domestic abuse services, leading to the further marginalisation of sexual violence services within a broader VAWG agenda.

The loss of women's space and the move towards gender-neutral services, including for BME women

and those with complex needs, is also causing concern as this may prevent some women and girls coming forward to seek help.

We recognise the pressures faced by Commissioners at this time of continued cuts, but it is truly disappointing that many of the challenges highlighted in the 2015 APPG report on the Funding and Commissioning Landscape for Domestic and Sexual Abuse Services remain, and what was increasingly seen as becoming unstable and uncertain, has now become a crisis.

The APPG was further disheartened to learn of new challenges for the sector. These include the reduced level of (already minimal) funding from CCGs to local specialist services, the missed opportunity of the domestic abuse consultation to encompass sexual violence, and the messaging that encourages victims and survivors to report sexual offences while Crown Prosecution Service (CPS) statistics evidence a drop in police referral rates, charging decisions, prosecutions and convictions.

⁶⁶Duncan Shrubsole, Deputy Director, Lloyds Bank Foundation for England and Wales; oral evidence to the APPG on Sexual Violence: The Funding Landscape. Part 2 Understanding the perspective of Funders and Commissioners

Summary

While we recognise the pressures faced by Commissioners, the APPG understands that good commissioning locally often now relies on the knowledge and passion of individual Commissioners, which, while welcome, is not the basis for a national systemic commitment to investing in specialist services. Finally, while the APPG is reassured to learn that the Rape Support Fund will continue for another three years, we have real fears that without a commitment to ring-fence these funds once devolved, specialist services could collapse.

On a more positive note, the APPG was pleased to learn that those with key responsibilities for commissioning national and local services for survivors recognise that approaches to providing support need to change to reflect the dramatically changing landscape. We welcome the cross-government Victims Strategy 2018 from the MoJ and the NHS England SAAS. Both strategies identify the need to provide better referral pathways, more joined-up approaches and long-term support that moves beyond the focus on the criminal justice system.

The APPG was pleased to learn of some new partnership models already working well and would encourage a close eye on ensuring we understand and share what works. However, no clear strategic direction has emerged from the Government on how to ensure good commissioning practice and service standards are enforced, and without this there is little chance of change. Specialist agencies need to

adapt to the changing landscape but without greater recognition by funders and Commissioners of their distinctive value, their future is under threat.

As it stands the Government's commitment in the 2016 VAWG strategy that by 2020 'no victim will be turned away' will not be achieved. But this is not an insurmountable problem. Specialist third sector organisations provide high quality services at a low cost to the state. With political will and substantial investment in a long-term, sustainable funding model for these organisations, access to specialist, holistic services for all sexual violence and abuse victims and survivors, whenever they need and want them, could become a reality.

“ Why? Why should any victim of sexual violence be forced to wait months, if not years on end for sustained support to help us process a trauma which was not our fault in the first place? Why should we endure ongoing nightmares or total emotional oblivion as we continue to sleepwalk through a world that continuously tells us it was our fault, with the knowledge that only 7% of our attackers will be convicted?... why? ”

Fern Champion, Survivor⁶⁷

⁶⁷Oral evidence to the APPG on Sexual Violence – the Funding and Commissioning Landscape 2018

Appendix on Rape Crisis England & Wales

Rape Crisis England & Wales is the national sexual violence and abuse charity and umbrella body for the network of 44 autonomous Rape Crisis Centres. Members have been providing frontline specialist, independent and confidential support services for victims and survivors of all ages who have experienced any form of sexual violence at any time in their lives since 1973. Rape Crisis England & Wales has provided the Secretariat for this APPG.

Despite historical and chronic underfunding, Rape Crisis Centres have been providing frontline specialist, independent and confidential services since 1973. They are women-led and offer a range of specialist support, advocacy, counselling and information for women and girls in safe spaces. Around half also provide separate services for men and/or boys. These services have a deep knowledge and understanding of what sexual violence victims and survivors want, especially in relation to those with complex needs, and their ability to provide responsive, local services is highly valued by victims and survivors.

There are currently 44 member Centres delivering across 56 locations within the Rape Crisis member network, down from a peak of 68 in 1984. Almost all receive core funding from the Ministry of Justice (MoJ) Rape Support Fund. However, the overall funding received by these services has in no way kept pace with, and continues to be completely disproportionate to, the high levels of demand they face. This has created wide inconsistencies in the provision of services across England and Wales. At end of the financial year 17/18 6,300 victims and survivors were waiting to access support from Rape Crisis services, with waiting lists for counselling ranging from 3 to 14 months, and a number of Centres have had to close their waiting lists altogether.

The national Rape & Sexual Abuse helpline, delivered by our member centre in South London, supporting victims and survivors of violence and abuse, does not receive any significant funding from national Government.

| Funding Awarded to | Purpose of Funding | Amount received (subject to change in December of 2018) | Source of Funds |
|----------------------------------|--|--|------------------------|
| Women's Aid and Refuge (jointly) | National Domestic Violence Helpline (NDVH) to support female victims of domestic abuse | £500,000 | Home Office |
| Respect | Respect helpline for perpetrators of domestic abuse and the Men's Advice Line for male victims of domestic abuse | £240,000 | Home Office |
| Safeline | National Male Rape and Sexual Abuse support helpline | £157,386 | Ministry of Justice |
| Karma Nirvana | Helpline for victims of 'honour-based' abuse | £150,000 | Home Office |
| Galop | National LGBT Domestic Abuse Helpline for LGBT victims of domestic abuse | £120,000 | Home Office |
| Revenge Porn Helpline | Revenge Porn Helpline | £80,000 | Home Office |
| Suzy Lamplugh Trust | National Stalking Helpline for victims of stalking | £50,000 | Home Office |
| Rape Crisis | National Rape Crisis Helpline for survivors of rape and sexual abuse | £10,400 | Home Office |

⁶⁸Rape Crisis England & Wales Funding and Commissioning Landscape survey for the APPG on Sexual Violence – the Funding Landscape for Sexual Violence Services 2018

www.rapecrisis.org.uk/all-party-parliamentary-group-appg-on-sexual-violence

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