

REPORT TITLE: Investment of the remaining unallocated Department for Levelling Up Housing and Communities (DLUHC) Domestic Abuse section 31 grant funding from the Financial Years 2021/22 - 2024/25

Cabinet Date	24 July 2024
Cabinet Member	Cllr Stephan Fifield, Cabinet Member for Adult Social Care Delivery
Key Decision	Yes
Purpose of Report	The purpose of this report is to seek Cabinet approval to allocate the remaining unallocated Department for Levelling Up Housing and Communities (DLUHC) Domestic Abuse section 31 grant funding for 2021/22 – 2024/25 of £1.286m (the “Domestic Abuse Grant”) for the purpose of enabling the council to meet its statutory duties under part 4 of the Domestic Abuse Act 2021.
Recommendations	<p>That Cabinet:</p> <ol style="list-style-type: none"> 1. Approves the allocation of up to £1,274,500 from the council’s Domestic Abuse Grant for the delivery of support in domestic abuse safe accommodation and to contribute towards the associated administrative burdens in meeting the council’s duties under part 4 of the Domestic Abuse Act 2021. Recommendations 2-7 below set out the use of this funding. 2. Approves the allocation of £366,000 (£122,000 per annum) from the Domestic Abuse Grant for the purpose of funding the cost of the contract described in Recommendation 3. 3. Approves the direct award of a three year contract (commencing 1 April 2025) to Stroud Beresford Group for the provision of support for adult and child victims of domestic abuse in refuge accommodation using the resources described in Recommendation 2. 4. Delegates authority to the Director of Public Health, in consultation with the Cabinet Member for Adult Social Care Delivery to:

(a) allocate £336,000 from the Domestic Abuse Grant for the purpose of funding the call-off contract described in Recommendation 4(b); and

(b) award a Call-Off Contract for the supply of Support in Safe Accommodation to the sole appointed supplier under Lot B of the council's proposed Gloucestershire Domestic Abuse Support Service (GDASS) Single Provider Framework Agreement (which shall be the subject of a separate Cabinet Decision also scheduled for 24 July 2024) using the resources described in Recommendation 4(a). The proposed Call-Off Contract shall continue for a period of one year.

5. Delegates authority to the Director of Public Health in consultation with the Lead Cabinet Member for Adult Social Care Delivery to allocate a maximum of £342,500 on the basis set out in Recommendations 5 (a) to (c) via Gloucester City Council (as the host local authority for the Housing Partnership Team which acts on behalf of the District and County Councils, the Gloucestershire Office of the Police and Crime Commissioner (OPCC) and the Gloucestershire Integrated Care Board (ICB)) to be used at district level for funding the following activities:

(a) £190,000 for the purpose of funding the provision of domestic abuse support in a pilot Respite Rooms scheme over a maximum period of three years (see paragraphs 18-19 of this report for background details of the proposed scheme). The amount proposed is indicative at this stage as it will be determined by the Director of Public Health based on the agreed delivery model and length of the proposed Respite Rooms pilot scheme.

(b) £125,000 for the purpose of providing funding, during a two year period commencing from the date of transfer of such funding to contribute towards the administration costs incurred by whichever two of Cheltenham Borough Council, Cotswold District Council, Forest of Dean District Council, Gloucester City Council, Stroud District Council and Tewkesbury Borough Council are selected by the Gloucestershire Housing Partnership to carry out the system and policy work that is needed for completing tranche one of the Domestic Abuse Housing Alliance (DAHA) accreditation for district council Housing Services described in paragraph 25 of this report. The amount is indicative at this stage as it is subject to the council receiving confirmation from the selected local authorities of their estimated staffing costs.

	<p>(c) £27,500 for the purposes of continuing to fund the appointment of two countywide Domestic Abuse Intervention Officers (DAIOs) who will work across all the district councils in Gloucestershire during the period 1 April 2025 to 30 June 2025. The amount is indicative at this stage because the relevant local authorities will need to confirm the pro-rata staffing costs for the period above.</p> <p>6. Delegates authority to the Executive Director of Children’s Services to:</p> <p>(a) allocate £200,000 from the Domestic Abuse Grant for the purpose of funding the cost of the call-off contracts described in Recommendation 6(b);</p> <p>(b) procure and award, subject to the financial limit set out in Recommendation 6(a) above, over a period of up to two years expiring 1 September 2027, as many call-off contracts under the council’s Access to Resources Framework Agreement as may be required for the provision of trauma recovery therapeutic support services for children and young people accessing domestic abuse safe accommodation.</p> <p>7. Delegates authority to the Director of Public Health in consultation with the Lead Cabinet Member for Adult Social Care Delivery to allocate up to £30,000 from the Domestic Abuse Grant for the purposes of contributing to Gloucestershire County Council’s administrative costs during the period 1 April 2025 to 30 June 2025 in meeting its statutory duties under part 4 of the Domestic Abuse Act 2021. The amount is indicative at this stage as the council and the OPCC (as host for the joint funded roles described in paragraph 47 of this report) will need to agree the pro-rata staffing costs for such roles during the period.</p>
<p>Reasons for Recommendations</p>	<p>To ensure that the council meets its statutory duties/functions relating to the provision of support within domestic abuse safe accommodation (which is contained within Part 4 of the Domestic Abuse Act 2021), and to allocate the Domestic Abuse Grant in line with these requirements.</p> <p>To allocate grant funding for the Financial Years 2021/22 – 2023/24 where there has been underspend on those grant allocations.</p> <p>To allocate the remaining grant allocation for 2024/25, noting some spend has been approved within previous cabinet decisions in March 2023 when the council had confirmation of its allocations for 2023/24 and 2024/25.</p>

<p>Resource Implications</p>	<p>The decisions within this paper will be entirely funded from the above-mentioned Domestic Abuse Grant unallocated grant funding for Financial Years 2021/22 – 2024/25. No additional council funding is therefore required.</p> <p>There is a total of £1,286,878 Domestic Abuse Grant remaining uncommitted to date (when taking in to account existing decisions). See paragraph 4 and annex 1 for context regarding the grant allocations to date.</p> <p>The total funding required for recommendations 1-7 is £1,274,500 which will be funded using the available grant funding as described above. Any remaining funding from the Domestic Abuse Grant will be carried forward to enable further service, support, and commissioning activities, which are to be proposed to Cabinet when the council receives confirmation of the Domestic Abuse Grant allocation for the Financial Year 2025/26.</p> <p>Where indicative values have been provided in the Recommendations above, these will be finalised in the following ways:</p> <p>Recommendation 5(a) Respite Rooms – through confirmation of the final value of domestic abuse support costs within the Respite Rooms contract (which will be commissioned by the Housing Partnership Team), these costs will not exceed £190,000.</p> <p>Recommendation 5(b) DAHA accreditation - the final value allocated will be subject to which two districts undertake the work in this tranche (noting the intention to fund the other district councils during 2025/26 and 2026/27) and whether they only deliver the statutory housing functions (resulting in Domestic Abuse Grant of £50,000 per district) or whether they also have a housing management function and so require more staff resource needed to complete accreditation (resulting in Domestic Abuse Grant of £75,000 per district).</p> <p>Recommendation 5(c) DAIOs – the confirmation of the final staffing costs is pending on discussions with partner agencies which need to take place once indicative funding is confirmed.</p> <p>Recommendation 7 Admin Burdens – the confirmation of the final staffing costs is pending development of the domestic abuse strategy for 2024-2027 and discussions with partner agencies will take place once indicative funding is confirmed.</p>
<p>Background Documents</p>	<p>See annex 2 for the full list of previous applicable decisions and the guidance that has informed the recommendations within this paper.</p>
<p>Statutory Authority</p>	<p>Domestic Abuse Act 2021</p>

Divisional Councillor(s)	All
Officer	Name: Beth Bennett-Britton (Consultant in Public Health) Tel. no: 01452 427619 Email: Beth.bennett-britton@gloucestershire.gov.uk
Timeline	<p>Recommendations 2-3 Contract prepared August 2024, contract awarded and issued September 2024, contract starts April 2025</p> <p>Recommendation 4 Call off negotiations early 2024 with call-off contract to commence 1 July 2025</p> <p>Recommendation 5(a-c) Delegated decisions to transfer of funding to district councils to be taken July - October 2024</p> <p>Recommendation 6 Delegated decision to be taken during 2024/25</p> <p>Recommendation 7 Delegated decision to be taken September - October 2024</p>

Background

1. Under the Domestic Abuse Act 2021, Gloucestershire County Council as a Tier 1 Local Authority has a statutory duty to provide support to victims of domestic abuse and their children residing within refuge and other 'domestic abuse safe accommodation'. The Act also includes a requirement for the County Council to convene a multi-agency Domestic Abuse Local Partnership Board (LPB); complete a Needs Assessment; develop a Domestic Abuse Strategy; and commission in line with said strategy. For further details on the Domestic Abuse Act – see background within the July 21 Cabinet Decision.
2. The council has received Domestic Abuse Grant funding to support the delivery of this statutory duty since 2021/22 and has a confirmed allocation for 2024/25.
3. Previous Cabinet and Officer Decisions have allocated proportions of the Domestic Abuse Grant for 2021/22 – 2024/25, and links for the published decisions to date can be found within annex 2.
4. This paper outlines the proposed use of the remaining unallocated funds for 2024/25 as well as underspend accrued (including unallocated funding and underspend on allocated funding) during 2021/22 – 2023/24. Further details can be found within annex 1. The council has allocated its grant funding across Cabinet and officer decisions since 2021/22 but has uncommitted funding which has yet to be allocated. This is due in part to needing time for the needs

assessment and strategy to be completed in 2021 to inform future commissioning activity. There was also further development work undertaken over two years as part of the delivery plan for the 2021 strategy which has informed specific plans in relation to Respite Rooms and DAHA accreditation, as well as informing the overall proposed use of the funding.

5. The proposals reflect the strategic priorities of Gloucestershire Domestic Abuse Strategy and its accompanying Delivery Plan, namely, to provide high quality service provision for victims and their families. They have also been informed by actions within the Delivery Plan to consider how current commissioned services are meeting the needs of victims from different protected characteristic groups and victims with complex needs.

Refuge (as described in Recommendations 2 and 3 above)

6. The current contract with Stroud Beresford Group to deliver the Support in Refuge Accommodation contract was awarded in April 2021 as a non-competed call-off from the Gloucestershire Domestic Abuse Framework as Stroud Beresford Group were the only provider on Lot 2 (Provision of Places of Safety) on the Framework who delivered a refuge model within Gloucestershire. Links are provided in annex 2 to the previous decisions in relation to the Lot 2 call-off contract. Market engagement was carried out with providers who had expressed interest in providing services through Lot 2, however no other providers were able to deliver the service.
7. The statutory Domestic Abuse Needs Assessment which was completed in 2021 and reviewed in 2022 and 2023 confirms that Stroud Beresford are the only provider delivering refuge accommodation (as meeting the prescribed definition within the statutory guidance) in Gloucestershire.
8. The Gloucestershire Domestic Abuse Strategy 2021-24 set out the county's intentions in meeting its duties under part 4 of the Act and recognised the need within this to strength our accommodation-based support offer which included providing funding for specialist support within the current refuge (provided by Stroud Beresford) which is the only refuge in Gloucestershire.
9. Continuing to allocate a proportion of the grant towards the Refuge's support costs enables appropriate use of the grant funding through the provision of specialist domestic abuse support to victims/survivors within refuge accommodation whilst also enabling Stroud Beresford Group to spend less time seeking charitable funding and giving assurance with committed funding for the next three years.

Gloucestershire Domestic Abuse Support Service Recommissioning (as described in Recommendation 4(a-b) above)

10. The council's current call-off contract with GreenSquareAccord Limited for the delivery of Gloucestershire Domestic Abuse Support Service (GDASS) is due to

end on 30 June 2025. A separate paper will therefore be presented to July 2024 Cabinet under which approval will be sought for the recommissioning of such services by way of a single provider framework agreement. This framework agreement will include the provision for the delivery of support in safe accommodation via Lot B of the framework.

11. The current GDASS service has delivered services funded from the Domestic Abuse Grant since January 2022 (providing support to victims in/to access Places of Safety and target hardened properties, and a Flexible Funding pot), with additional funding allocated when the contract was extended to acknowledge the time spent by staff in supporting clients to access safe accommodation and while residing in safe accommodation as well as funding new roles to work within the registered housing provider sector.
12. At present the Domestic Abuse Grant accounts for £322,352 (25%) of the annual contract value during the contract extension.
13. The Domestic Abuse Grant enables the supplier of GDASS to provide additional community-based support by providing increased staff capacity to cover support in safe accommodation that would otherwise have been carried out within the core functions of the service (delivery of support to access safe accommodation and support in Places of Safety¹ and target hardened properties²). The funding has also provided for additional dedicated domestic abuse support for the expanded local safe accommodation schemes (both the Places of Safety and Target Hardening contracts have increased in the last two years), and to provide support within the Registered Provider sector.
14. The estimated value of the proposed call-off contract for the supply of support in safe accommodation under Lot B of the council's proposed Gloucestershire Domestic Abuse Support Service (GDASS) Framework Agreement is £336,000 which represents a significant investment into the service to provide vital support to victims in safe accommodation.
15. Given the statutory duty to provide support to victims in safe accommodation continues, the intention is to continue to use a proportion of the Domestic Abuse Grant funding (circa 30%) to support delivery of specialist domestic abuse support to victims in/or to access domestic abuse safe accommodation within the recommissioned GDASS Framework Agreement.
16. The recommendation is to allocate £336,000 from the 2024/25 domestic abuse grant to be used within the first year of the recommissioned GDASS Framework Agreement (1 July 2025 – 30 June 2026). Subsequent Cabinet decisions would be taken annually to allocate funding a year in advance starting from the 2025/26 Financial Year (to allocate to GDASS contract Year 2), subject to continued government funding.

¹ Places of Safety is a dispersed domestic abuse safe accommodation scheme

² Target hardening is where additional security measures have been installed to enable the victim/survivor to remain safely in their own home

17. The funding for the proposed call-off for the supply of support in safe accommodation would be roughly allocated as follows:

- a. Support to victims/survivors across a spectrum of risk to access safe accommodation, support when in Places of Safety and target hardened accommodation, and work within the registered housing provider sector (66%).
- b. Management and administration of support in safe accommodation including management of the Flexible Funding Pot (22%).
- c. Flexible Funding pot (12%) e.g. travel costs, delivery/house removals of goods, essential white goods, essential furniture, kitchen essentials, bedding or baby toddler needs etc.

This apportionment is indicative at this stage and will be agreed as part of the Lot B call-off negotiations with the future provider of GDASS under the single provider framework agreement. The final apportionment will be confirmed within the delegated decision to be taken under Recommendation 3(b) above.

Respite Rooms (as described in Recommendation 5(a) above)

18. Respite Rooms are a short stay supported accommodation option to support individuals who have experienced domestic abuse and/or Violence Against Women and Girls (VAWG) and have complex needs. They can be single gender or sex depending on local need. Respite Rooms were piloted nationally in 12 local authority areas delivering service models ranging from specialist support in office hours with concierge support out of hours to 24/7 specialist staffed projects. The specialist support in Respite Rooms is by design much broader than the offer within refuge or dispersed accommodation models to reflect the needs of the victims/survivors accessing the scheme. For example, it provides not only domestic abuse and housing related support but also substance misuse support, counselling, or mental health support. A link is provided in annex 2 for the evaluation of the pilot scheme.
19. The requirement for support in safe accommodation includes that it is delivered in single gender or single sex accommodation. Women who sleep rough are likely to have experienced domestic abuse and VAWG at some stage in their lives. This may be due to fleeing domestic abuse which had resulted in their current homelessness, past experiences of domestic abuse (as a direct victim or witnessed within the family home) or through entering relationships, as a means of accessing somewhere to stay while homeless, which become abusive and exploitative.
20. The proposal to consider funding for domestic abuse support within a Respite Rooms model comes both from the council and from the Gloucestershire Housing Partnership Teams.

21. An action for the council on the Gloucestershire Domestic Abuse Strategy's Delivery Plan required the scoping of existing domestic abuse safe accommodation options in the county for victims/survivors with complex needs and to look at options for ensuring complex needs of abuse victims can be addressed within support in safe accommodation provision. It was concluded that, while there are options for victims and survivors with complex vulnerabilities, victims/survivors with complex needs cannot always be supported in communal settings such as refuge, for example if their behaviour may impact on other victims and/or their children and may require additional more specialist support around a wider set of needs than is offered by Places of Safety (dispersed safe accommodation model). It was considered that there are safe accommodation models that could better meet the additional needs of victims/survivors with complex needs, one of which was Respite Rooms.
22. Concurrently, Gloucestershire Housing Partnership Team had started exploring the options for women who are, or are at risk of, sleeping rough in the county many of whom will have experienced domestic abuse. A Women's Rough Sleeping Census was carried out in September/October 2023 which has also informed the appraisal of the potential options. The Partnership Team determined that they wanted to explore the option to commission a Respite Rooms pilot to meet the needs of women who sleep rough in the county and to reflect their specific support needs in relation to domestic abuse and VAWG.
23. Domestic Abuse Grant funding would be used to provide the specialist support within the service with a focus on domestic abuse but also acknowledging the wider experiences of VAWG and trauma which impact on the complex needs of women who sleep rough.
24. The Housing Partnership Team are hosted by Gloucester City Council and act on behalf of the Gloucestershire Housing Partnership (including the district councils, the County Council, the OPCC and the ICB). The team will undertake the commissioning for Respite Rooms on behalf of the Partnership, but the county council will comment on proposals and agree the final value and use of the domestic abuse support funding within the proposed delegated decision. The Partnership Team are best placed to commission this project given its strong ties with the countywide approach to ending rough sleeping which also sits within their remit.

Domestic Abuse Housing Alliance (DAHA) Accreditation (as described in Recommendation 5(b) above)

25. DAHA accreditation was established by the Domestic Abuse Housing Alliance to improve the housing sector's response to domestic abuse and is acknowledged by DLUHC as best practice. The accreditation aligns with DAHA's work to develop the Whole Housing Approach (WHA) Toolkit³ which provides advice and best practice on how support can be provided to domestic abuse victims across a range of housing tenures as well as housing's role in perpetrator management.
26. DAHA accreditation is available to housing providers and local authority housing options teams.
27. The Gloucestershire Housing Partnership have been championing the benefits of DAHA accreditation for district housing options services in the county and will provide strategic support for the accreditation process between districts.
28. The council became White Ribbon accredited this year (see annex 2 for links to additional information) and as part of accreditation an action plan has been developed which includes an action to: *work with the Gloucestershire Strategic Housing Partnership and district councils to explore promotion of DAHA (Domestic Abuse Housing Alliance) accreditation for housing providers in Gloucestershire*, and this recommendation would support that action.
29. All partners in the Gloucestershire Housing Partnership agree that meeting the accreditation costs is part of demonstrating a council's commitment to tackling domestic abuse and delivering services that support and empower victims/survivors of domestic abuse. However, accreditation also creates an additional administrative burden for local authorities and requires staffing resources within the district councils to manage the accreditation process and deliver organisational change. Being mindful that all local authorities have increasing pressures within housing services this recommendation looks to provide funding for dedicated staffing resource within housing options services (one part-time coordinator per area) to deliver the accreditation for their housing services. The Housing Partnership Team's Domestic Abuse Coordinator will have a strategic oversight of the DAHA accreditation work within Gloucestershire.
30. The local authorities supported under tranche one of funding (as described in Recommendation 5(b)) will be confirmed once decisions are made at a local level to commit to start the accreditation work and as such the delegated decision will allow time for the first two districts to be confirmed. There is the intention to make further decisions to award an additional two tranches of funding to

³ <https://www.dahalliance.org.uk/innovations-in-practice/whole-housing-approach/>

resource this activity across all six districts, subject to the availability of future Central Government domestic abuse grant funding.

31. DAHA accreditation and adoption of a Whole Housing Approach will help housing services/providers identify signs of domestic abuse, engage with victims and perpetrators, and seek out the best solutions for victims including support to remain safely in their own homes where appropriate including consideration of target hardening. The DAHA Coordinator within each district will also then champion DAHA accreditation with housing providers in their area.
32. Housing providers are in a unique position to identify domestic abuse at an early stage through their direct contact with tenants when responding to requests for repairs, reports of anti-social behaviour or rent arrears, where these may be as a result of domestic abuse within the household. Most local authorities in Gloucestershire (Cotswold District Council, Forest of Dean District Council, Gloucester City Council and Tewkesbury Borough Council) have housing options functions but do not own their own housing stock. Offering funding to local district councils' Housing Options Services will support the improvement of the response to domestic abuse within the context of statutory housing duties and will enable greater consideration of what safe accommodation options may be available for victims/survivors in different tenures. Cheltenham Borough Council and Stroud District Council also own their own registered housing stock and providing funding to accredit both the housing services and housing management functions brings added benefits that these councils will have tenants who are living in target hardened properties (properties that have had target hardening or sanctuary scheme works completed come under the definition of domestic abuse safe accommodation) as well as tenants who will experience or perpetrate domestic abuse while residing in their housing stock.

Domestic Abuse Intervention Officers (DAIOs) (as described in Recommendation 5(c) above)

33. Recommendation 5(c) is to continue to allocate a proportion of the Domestic Abuse Grant funding to fund to DAIO posts to work within the district councils' Housing Options Services. Funding was allocated for DAIOs at Cabinet in July 2021 and the roles have been funded since the 2022/23 Financial Year. The funding currently ends 31 March 2025.
34. DAIOs provide interventions for victims/survivors of domestic abuse, who have approached Housing Options Services, to obtain swift but sustainable housing solutions by putting victims at the centre of service delivery responding to individual experiences, reactions and needs. This will include supporting access to safe accommodation where needed and supporting victims/survivors while in safe accommodation to navigate housing duties and pathways to find a safe onward housing option.
35. Providing funding initially for a three month period from the currently available grant funding ensures short term continuity for these roles until a longer term decision can be made following confirmation of whether further government

funding will be made available to support the council in meeting its burdens arising from the Act in the Financial Year 2025/26.

36. A delegated decision will be taken following confirmation from the district councils on the future hosting arrangements for these roles (and confirmation of costs).
37. The intention is to consider further funding for the DAIOs once confirmation of the of the council's 2025/26 grant (or equivalent funding) has been received from government. Decision making would begin as soon as possible after this confirmation is received. At this stage the council intends to bring a paper to March 2025 Cabinet to allocate its funding for 2025/26, but it is recognised that this would be difficult for district council colleagues to make decisions on these roles if a decision is not made until late March 2025 so three months funding for DAIOs is recommended as an interim solution to allow continuity for staff currently in post.

Trauma recovery support for children accessing domestic abuse safe accommodation (as described in Recommendation 6 above)

38. The council's duties under Part 4 of the Domestic Abuse Act 2021 extend to children (under the age of 18) who are now deemed victims of domestic abuse in their own right if they see, hear or experience the effects of domestic abuse and are related to the victim and/or the perpetrator.
39. The proposed trauma recovery support offer will enable a bespoke offer (from a suite of therapeutic options) of support to children and young people accessing domestic abuse safe accommodation. Most young people who are in domestic abuse safe accommodation (and as such eligible for the service) will be victims of domestic abuse through experiencing its effects in the family.
40. There will also be young people aged 16 or 17 who are in domestic abuse safe accommodation as a result of being a direct victim of domestic abuse in their family or intimate relationships will be able to access the service but will also have an alternative pathway in to the trauma recovery service for adult victims/survivors of domestic abuse accessing safe accommodation (as approved by Cabinet in March 2023), dependant on the appropriate offer for their needs.
41. The support would be called off the council's existing Access to Resource Framework within the Children and Families Commissioning Hub. The Access to Resources Framework is used to source providers of professional services to address unmet needs of children, young people and/or their families for children's social care and includes the delivery of therapeutic interventions.
42. The delegated decision will further define the eligibility and scope of the support offer within the pilot including the suite of therapeutic support (which will be tailored to best suit the individual child's needs) that can be called off under the

Access to Resource Framework. There will also be consideration of how this will interact with other support options for children and young people experiencing domestic abuse.

43. There is currently not enough data to scope the specification for a standalone service so piloting a bespoke offer to call off therapeutic services under the Access to Resources Framework as a spot or block purchase based on emergent needs will allow the council to develop an evidence base on demand for therapeutic interventions, types of support requested and any gaps in need and location of provision that cannot be met through the framework.
44. The proposed pilot offer would continue for as long as the funding allows, and further provision will be considered based on outcomes from the pilot, on availability of future funding through DLUHC or other funding streams, and in conjunction with consideration on outcomes from the adults' trauma recovery service pilot.

Council administrative burdens (as described in Recommendation 7 above)

45. Recommendation 5 is to continue to allocate a proportion of the Domestic Abuse Grant funding to pay for the council's administrative burdens in meeting the statutory duties under part 4 of the Domestic Abuse Act 2021. Funding has been allocated for the council's administrative burdens since Cabinet in July 2021.
46. The statutory duties are:
 - a. Appoint a multi-agency Domestic Abuse Local Partnership Board which it must consult as it performs certain specified functions (below).
 - b. Assess, or make arrangements for the assessment of, the need for accommodation-based domestic abuse support in their area for all victims and their children who reside in relevant safe accommodation, including those who come from outside of their area.
 - c. Prepare and publish a strategy for the provision of such support to cover their area having regard to the needs assessment.
 - d. Give effect to the strategy (through commissioning / decommissioning decisions).
 - e. Monitor and evaluate the effectiveness of the strategy.
 - f. Report back annually to central government.
47. The current administrative burdens funding is used to support a proportion of the salary costs of roles/joint funded roles across the Council (Public Health Manager), and the Office of the Police and Crime Commissioner (County Domestic Abuse and Sexual Violence (DASV) Strategic Coordinator, DASV Consultation Officer and DASV Programme Assistant) who carry out activities to meet these statutory duties.
48. Providing funding initially for a three-month period from the currently available grant funding ensures short term continuity for these roles until a longer-term

decision can be made following confirmation of the central government funding made available to support the council in meeting its burdens arising from the Act in the Financial Year 2025/26.

49. The delegated decision to confirm the allocation of the initial funding for 1 April 2025 to 30 June 2025 will be taken in September/October 2024 once the new Gloucestershire Domestic Abuse Strategy (October 2024 – September 2027) and its accompanying delivery plan is in place. Allocating funding would ensure continuing resource is available to cover activity relating to the new strategy.
50. The intention is to consider further funding to meet the council's administrative burdens following the allocation of the council's 2025/26 grant (or equivalent funding). Decision making would begin as soon as possible after confirmation of any further grant is received from government. At this stage the council intends to bring a paper to March 2025 Cabinet to allocate its funding for 2025/26, but it is recognised that this would be difficult for council and OPCC colleagues to make decisions on staff roles if a decision is not made until late March 2025 so three months funding for admin burdens is recommended as an interim solution to allow continuity for staff.

Options

Option 1: the preferred option - To proceed with the recommendations as outlined above.

51. This will enable the council to meet its statutory duties as a Tier 1 Local Authority under part 4 of the Domestic Abuse Act 2021, and to use the Domestic Abuse Grant funding in a manner that reflects the DLUHC statutory guidance on the delivery of support to victims of domestic abuse and their children in domestic abuse safe accommodation services. Proceeding with the recommendations also contributes towards the council meeting the requirements of the Gloucestershire Domestic Abuse Delivery Plan and the successful implementation of Gloucestershire's Domestic Abuse Strategy.

Option 2: not recommended - To proceed with an alternative configuration of recommendations rather than the recommendations as outlined above.

52. Alternative configurations of proposals were considered in order to determine the best use of the grant. These included: bringing a reduced number of proposals to Cabinet in 2024/25 (to ensure continuation of service and support) and delaying the remaining activities proposals to Cabinet until the council received confirmation of the Domestic Abuse Grant allocation for the Financial Year 2025/26 and adjusting the amount of funding proposed for the different activities. It was considered that the recommendations proposed above made the best use of the allocated funding to enable existing and new activity to support victims in domestic abuse safe accommodation without causing breaks in service and support or delaying commissioning activity.

Option 3: not recommended - Not to proceed with the recommendations as outlined above.

53. This will prevent the council from meeting its statutory duties as a Tier 1 Local Authority under part 4 of the Domestic Abuse Act 2021. Not proceeding would impact on our ability to meet the requirements of the Gloucestershire Domestic Abuse Delivery Plan and the successful implementation of Gloucestershire's Domestic Abuse Strategy which would impact the support available to victims/survivors and present a reputational risk to the council. We would also be in breach of the council's Memorandum of Understanding with DLUHC relating to the Domestic Abuse Grant funding which may affect the award of future funding.

Risks

Recommendations 2 and 3 – support in refuge accommodation

54. There is a risk in respect of any direct contract award that it may become the subject of a legal challenge under public procurement law. While it is acknowledged that a direct contract award is only permissible under public procurement law in very limited circumstances, a direct contract award is justifiable in this instance, i.e., without first carrying out a competitive procurement process, as it satisfies the "safe harbour" criteria for making direct contract awards under the Public Contracts Regulations 2015 on the basis that the funding is being awarded to Stroud Beresford Group as the only provider of refuge accommodation in Gloucestershire that meets the statutory definition of refuge accommodation in the context of support in safe accommodation. The strategic intention within the Domestic Abuse Strategy is to provide funding for support within the existing refuge accommodation. It is evidenced by prior market engagement and the Domestic Abuse Needs Assessment in 2021, and subsequent annual refreshes in 2022 and 2023 which confirm that Stroud Beresford Group is the only provider of refuge in the County. The contract would be funded by available Domestic Abuse Grant funding and as such there is no financial risk to the council.

Recommendation 4 – support in safe accommodation

55. The allocation for funding for support in safe accommodation in Recommendation 3 would be funded by available Domestic Abuse Grant funding and as such there is no financial risk to the council. The contract would be called-off the competitively procured Single Provider Framework Agreement for the delivery of GDASS and as such is considered low risk. Further details on the recommissioning of GDASS and the proposed single provider framework agreement are provided within a separate July 2024 Cabinet Paper.

Recommendation 5(a) support in respite rooms, Recommendation 5(b) administrative burdens relating to DAHA accreditation and Recommendation 5(c) DAIOs

56. The allocation of funding for these recommendations would be funded by available grant funding and as such the risk of being unable to meet the financial obligations arising from these recommendations is considered to be low. Any risks of allocating the funding for use by the district councils, including subsidy control risks, will be explored within the subsequent delegated decisions.

Recommendation 6 – trauma recovery support for children accessing domestic abuse safe accommodation

57. The allocation of funding for this recommendation would be funded by available Domestic Abuse Grant funding and as such the risk of being unable to meet the financial obligations arising from this recommendation is considered to be low. Any procurement risks re use of the Access to Resource Framework will be considered within the delegated decision.

Recommendation 7 – Council’s administrative burdens

58. The allocation of funding for this recommendation would be funded by available Domestic Abuse Grant funding and as such the risk of being unable to meet the financial obligations arising from this recommendation is considered to be low.

Financial implications

59. The investment required to implement Recommendations 1- 6 shall be drawn from uncommitted Domestic Abuse Grant funding for the Financial Year 2024/25 and underspend remaining within the Domestic Abuse Grant for 2021/22 – 2023/24 as set out in annex 1. The uncommitted and underspent funds are ringfenced within the council’s domestic abuse budget. The funding can only be used within the remit of the Memorandum of Understanding with DLUHC that the grant only covers expenditure in relation to the functions set out in Part 4 of the Act on Tier 1 Local Authorities relating to the provision of accommodation-based support to victims of domestic abuse and their children.

60. Total estimated spend across recommendations 1-6 above will not exceed £1,274,500 and is covered by available grant funding from the DLUHC. Any remaining funding from the Domestic Abuse Grant will be carried forward to enable further service, support, and commissioning activities in line with the council’s statutory duties and approval will be sought by the appropriate governance route.

Climate Change and Ecological implications

61. A Climate Impact Assessment Tool (CIAT) has been completed jointly for Recommendations 2 and 3.

62. The CIAT for support in refuge has identified several areas where there are slight or short-term negative impacts in relation to: air quality, sustainable transport and energy use. These are predominantly linked to travel by staff and by service users including their belongings. We will work with the provider to consider options to reduce the impact during the lifetime of the contract.
63. A CIAT will be completed for the recommissioning of GDASS as part of the July 2024 cabinet decision which will encapsulate activity arising from Recommendation 4(a-b) as well as the wider activity within GDASS.
64. A CIAT will not be completed for Recommendation 5(a)-(c) as this activity will not be led by the council but any environmental sustainability approaches that can be built into the roles will be encouraged.
65. A decision will be made on whether a CIAT needs to be completed for Recommendation 6 at the point when the delegated decision is made.
66. A CIAT will not be completed for Recommendation 7 as this relates to staff roles within the council and OPCC.
67. An Ecological Impact Assessment has not been completed, as the Climate Impact Assessment Tool has not highlighted any biodiversity impacts.

Equality implications

68. An Equalities Impact Assessment (EqIA) has been completed for Recommendations 2 and 3 (Support in Refuge Accommodation) which reflects that the areas of unmet need identified for some groups is largely met within the provision of support in the other safe accommodation settings. Support in Refuge is only available to women accessing the refuge, but this is proportional given the gendered nature of domestic abuse and that support in refuge only accounts for a small percentage of the total support in safe accommodation available in Gloucestershire.
69. An EqIA has been completed for Recommendation 4(a-b) to allocate funding to the recommissioning of GDASS, which reflects areas where further development work will continue within the recommissioned service, as well as additional areas of data needed in relation to the additional groups.
70. An EqIA has been completed for Recommendation 5(a) (Support in Respite Rooms) which highlights that the recommendation addresses some of the unmet needs relating to support in other safe accommodation provisions as it is tailored to meet the needs of domestic abuse victims with complex needs.
71. An EqIA has not been undertaken for Recommendation 5(b) (staffing for DAHA accreditation) but enhancing the skills of housing services to respond to victims of domestic abuse will provide a positive impact to all victims/survivors approaching them for support.

72. An EqlA has not been undertaken for Recommendation 5(c) (DAIOs), but these roles enhance the response to victims of domestic abuse will provide a positive impact to all victims/survivors approaching them for support.
73. An EqlA has not been completed for Recommendation 6 as there is limited demographic information available on children accessing safe accommodation. Data will be captured as part of the pilot to enable an EqlA to be completed prior to any future decisions on funding for this cohort.
74. An EqlA has not been completed for Recommendation 6 as the recommendation directly relates to staff within the council any personal data within an EqlA would be identifiable.

Data Protection Impact Assessment (DPIA) implications

75. Recommendations 2 and 3 - A DPIA is already in place for the current Support in Refuge contract with Stroud Beresford Group and is updated annually, or in the event of any significant changes to data processing or data protection arrangements. This DPIA will be reviewed and updated for the proposed new contract in conjunction with colleagues from the Information Management Service (IMS). The proposed contract will not create any significant changes to the current data protection and data controllership arrangements.
76. A DPIA is in place for the current GDASS contract, and commissioners will work closely with IMS to review and update the DPIA during the GDASS recommissioning process, including any specific requirements in relation to the delivery of support in safe accommodation (Recommendation 4(a-b)).
77. The data protection implications of Recommendation 5(a) – support in Respite Rooms will be considered by Commissioners and IMS to ensure the correct controllership relationship is in place and discuss sharing agreements if necessary. Commissioners will not seek to receive any personal data within performance monitoring in relation to the Respite Rooms provision, but it is possible that victims within that service may be already known to the council.
78. It is not considered that there are any data protection impacts arising from Recommendations 5(b) – administrative burdens relating to DAHA accreditation, or 5(c) - DAIOs, or 7 – council’s administrative burdens.
79. The data protection impacts of Recommendation 6 - trauma recovery support for children accessing domestic abuse safe accommodation will be considered within the delegated decision.

Social value implications

80. Recommendations 2 and 3: Social value has not been assessed given that the nature of the proposed funding for support in refuge accommodation is a proportion of a service’s total support costs.

81. Recommendation 4(a-b): Social value will be considered within the GDASS recommissioning tender.
82. Recommendations 5(a-c): Social value has not been assessed as the district councils will lead on these projects.
83. Recommendation 6: Social value is part of the tendering process to join the Access to Resources Framework.
84. Recommendation 7: Social Value has not been assessed as this relates to council staff roles.

Consultation feedback

85. No formal consultation has been undertaken with regards to these recommendations, but they are informed by feedback from victims and survivors through engagement work undertaken to inform the Gloucestershire Domestic Abuse Needs Assessment and Strategy, and regular feedback provided from service users within currently commissioned services. Updates have also been provided to the Local Partnership Board. There have been discussions with the Gloucestershire Housing Partnership Team with regards to proposed district level activity.

Officer recommendations

86. Officer advice is to agree all the recommendations in this report as set out in option 1.

Performance management/follow-up

87. Local authorities are required to complete and submit an annual DLUHC reporting template.
88. Recommendation 3 will be contract managed by the council. Regular contract monitoring and reporting processes will be in place, and reporting will be managed by these processes. The council will also report on progress to the Domestic Abuse Local Partnership Board as well as internal performance monitoring reporting.
89. Recommendation 4(b) will be contract managed by the council as part of the overall contract management of GDASS. Regular contract monitoring and reporting processes will be in place, and reporting will be managed by these processes. The council will also report on progress to the Domestic Abuse Local Partnership Board as well as internal performance monitoring reporting.
90. Recommendations 5(a-c) will be monitored by either one or more of the district councils or the Gloucestershire Housing Partnership Team, with oversight from the Gloucestershire Housing Partnership of which the council is a member.

91. Recommendation 6 will be contract monitored by the Children and Families Commissioning Hub and Public Health and Communities will also review the data to inform future decision making and to include within returns to DLUHC.
92. The Domestic Abuse Local Partnership Board will report progress on implementing the Gloucestershire Domestic Abuse Strategy to Safer Gloucestershire as well as informing the Health and Wellbeing Board.

Annex 1 – Remaining Domestic Abuse Grant funding 2021/22 – 2024/25

For the period 2021/22 - 2024/25 the council will have received £4,497,522 in Domestic Abuse Grant Funding and has allocated £3,543,924 following decisions made to date.

Cumulative Domestic Abuse Grant Funding and Funding Decisions 2021/22 – 2024/25	£4,497,522
Places of Safety	£674,614
Dispersed Refuge	£204,000
Support in Refuge accommodation	£332,400
GDASS support in safe accommodation	£847,686
DA Intervention Officers	£264,000
Specialist DA Workers in Housing Teams, DA Training and Housing Champions	£300,000
GCC Administrative Burdens:	
Strategic activities relating to meeting the council's statutory duties e.g. development and refreshes/reviews of the needs assessment, strategy and delivery plan, and commissioning activity.	£254,678
Operational activities relating to meeting the council's statutory duties e.g. consultation work and project work to inform strategic decisions.	£186,546
Counselling support for adult victims/survivors of domestic abuse in safe accommodation	£480,000
Total allocated to date from the Domestic Abuse Grants from the Financial Years 2021/22- 2024/25	£3,543,924
Total to be spent by the end of 2024/25 based on decisions made 2021/22 – 2023/24	£2,503,112
Total committed funding due to be carried forwards to future years	£707,532
Underspend accrued from previously allocated funding for Dispersed Refuge and GCC administrative burdens*	£333,280
Unallocated funding from the Financial Years 2021/22 – 2024/25	£953,598
Total available unallocated funding from the grant years 2021/22 - 2024/25	£1,286,878

*Where underspend has been accrued on previously allocated funding this due to underspend on the council's administrative burdens and no delivery of the planned support in dispersed Refuge model (no viable options were available to take this commissioning forwards on the Domestic Abuse Framework, and there has subsequently been a further increase in Places of Safety – dispersed safe accommodation scheme).

Annex 2 – background documents

[Cabinet decision, MHCLG Domestic Abuse section 31 grant funding for 2021/22, dated: 21 July 2021](#)

[Gloucestershire Domestic Abuse Needs Assessment 2021](#)

[Gloucestershire Domestic Abuse Strategy 2021-2024](#)

[Direct Award of a call-off contract under Lot 2 \(Provision of Places of Safety\) of the Gloucestershire Domestic Abuse Pseudo Framework, dated 23 Nov 2021](#)

[Statutory guidance - Delivery of support to victims of domestic abuse in domestic abuse safe accommodation services](#)

[Domestic Abuse Act 2021](#)

[Whole Housing Approach \(DAHA – Domestic Abuse Housing Alliance\)](#)

[DAHA Accreditation](#)

[Respite Rooms Pilot – Final Evaluation](#)

[Women’s Rough Sleeping Census](#)

[Health matters: rough sleeping - GOV.UK \(www.gov.uk\)](#)

[Investment of the unallocated Department for Levelling Up Housing and Communities \(DLUHC\) Domestic Abuse section 31 grant funding](#)