



REPORT TITLE: MHCLG Domestic Abuse Section 31 Grant Funding for 2021/22

Cabinet Date	21 st July 2021
Cabinet Member	Councillor Kathy Williams Cabinet Member, Adult Social Care Delivery
Key Decision	Yes
Purpose of Report	The purpose of this report is to seek Cabinet approval for investment of the MHCLG Domestic Abuse Section 31 Grant for 2021/22 to enable us to meet our statutory duties under the Domestic Abuse Act 2021.
Recommendations	<p>That Cabinet agrees to:</p> <ol style="list-style-type: none">1. Modify the existing Lot 1 provider contract with Gloucestershire Domestic Abuse Support Service (GDASS) up to the value of £405,968 over 2 + 2 years (the current contract ends 30th June 2023 and if the +2 option is exercised it will end 30th June 2025) to include: Floating Support (£12,000 x4 = £48,000); Flexible Funding (£40,000 x4 = £160,000) and Target Hardening/Sanctuary referral (£49,492 x4 = £197,968)2. Modify the existing Lot 1 provider contract with GDASS up to the value of £60,000 over three years with annual break clauses for Floating Support linked to call off contracts for Places of Safety and Dispersed Refuge (£12,000 x3 = £36,000; £8,000 x3 = £24,000) <p>Delegate authority to the Executive Director: Adult Social Care and Public Health, in consultation with the Cabinet Member for Adult Social Care Delivery to:</p> <ol style="list-style-type: none">3. Issue contracts under Lot 2 of the Domestic Abuse Framework up to the value of £800,000 over three years for the purpose of providing support in Places of Safety (£60,000 x3 + £18,100 x3 additional costs = £234,300); a DA Intervention Post (£88,000 x3 = £264,000); Specialist DA Advocates in Housing Teams; DA Training for the Housing Sector and DA Housing Champions (estimated £100,000 x3 = £300,000)4. Allocate a proportion of our Tier 1 administrative burdens funding towards posts which support the domestic abuse and sexual violence work associated with the duties arising from the Domestic Abuse Act 2021 to a maximum annual value of £100,000.

	<ol style="list-style-type: none"> 5. Run a mini competition on the DA framework under Lot 2 to support refuge accommodation up to the value of £300,000 over three years and award a contract to the successful bidder. 6. Issue contracts under Lot 2 of the Domestic Abuse Framework or the Community and Accommodation Based Support (CABS) Framework for scheme costs in dispersed refuge units to the maximum value of £180,000 over three years 7. Allocate the remainder of the grant (approximately £438,069 for 2021/22) following publication of the domestic abuse needs assessment and strategy in September 2021 and the subsequent investment recommendations from the LPB.
Reasons for recommendations	Our rationale for this recommendation is that compared to option b) (paragraph 5.1) it will minimise the delay in investment of our 2021/22 MHCLG domestic abuse grant funding and it will ensure that we meet our statutory duties with respect to the DA Act 2021.
Resource Implications	The investment required to implement the recommendations is within the Domestic Abuse Act 2021 MHCLG Grant allocation for 2021/22 (£1,105,661) however there are risks to the funding as outlined in the main report.
Background Documents	<ul style="list-style-type: none"> • Strategy to End Violence Against Women and Girls 2016 - 2020 • Gloucestershire Domestic Abuse and Sexual Violence (DASV) Strategy and Outcomes Framework 2014 - 18 • Domestic Abuse Act 2021 legislation • Domestic Abuse Act 2021 Overarching Factsheet • Domestic Abuse & Sexual Violence Commissioning Group (DASV CG) papers are available on request from Helen Flitton, Head of Commissioning for Drugs & Alcohol & Domestic Abuse Helen.Flitton@gloucestershire.gov.uk
Statutory Authority	Gloucestershire County Council's statutory duty under the Domestic Abuse Act 2021
Divisional Councillor(s)	All
Officer	Name: Helen Flitton Tel. no: 01452 328602 Email: Helen.Flitton@gloucestershire.gov.uk
Timeline	April 2021 – March 2022

Background

1.1 Domestic abuse (DA) causes harm to adults, children and communities; violates human rights and can affect anyone regardless of age, gender, sexuality, race, income, class, mental or physical ability and lifestyle.

1.2 There is increasing awareness and understanding that DA takes many forms and it is now understood to be far more prevalent than previously assumed. We also know that the emotional, academic and life chances of children who witness DA can be damaged by their experiences.

1.3 There are high economic, social and human costs on public services, communities and individuals as a result of DA. More effort and resources targeted on prevention and early intervention can reduce the impact DA has on attainment, health and wellbeing and crime and disorder.

1.4 Effective responses to DA require multi-agency co-operation and agreement for both the commissioning and delivery of services; there is an expectation from government that all publically funded partners should work together and the new legislation that came into effect in April increases expectations and responsibilities around public sector, including local authority, responses.

The Domestic Abuse Act 2021

2.1 In spring 2018, the Government conducted a public consultation on 'Transforming the Response to Domestic Abuse'. The Government response to the consultation and a draft Domestic Abuse Bill were published in January 2019. The response set out 123 commitments, both legislative and non-legislative, designed to promote awareness of domestic abuse; protect and support victims and their families; transform the justice process to prioritise victim safety and provide an effective response to perpetrators; and to drive consistency and better performance in the response to domestic abuse across all local areas, agencies and sectors.

2.2 The DA Bill had its first reading in the House of Commons in July 2019 and its second reading in October 2019 before the dissolution of Parliament. In December 2019 the new Government was elected with a manifesto commitment to "support all victims of domestic abuse and pass the Domestic Abuse Bill" originally introduced in the previous Parliament. The Bill was reintroduced in March 2020 and received Royal Assent in April 2021¹.

2.3 The aim of the Act is to raise awareness and understanding about the devastating impact of domestic abuse on victims and their families; further improve the effectiveness of the justice system in providing protection for victims of domestic abuse and bringing perpetrators to justice; and strengthen the support for victims of abuse by statutory agencies.

2.4 The Act creates a statutory definition of domestic abuse, emphasising that domestic abuse is not just physical violence, but can also be emotional, controlling or coercive, and economic abuse and establishes in law the office of Domestic Abuse Commissioner, setting

¹ [The Domestic Abuse Act 2021](#)

out the Commissioner's functions and powers. Importantly, it places a statutory duty on tier 1 local authorities to provide support to victims of domestic abuse and their children within refuge and other domestic abuse safe accommodation, with the aim of achieving consistency across England.

2.5 The main requirements under the statutory duty are to:

1. Convene a Domestic Abuse Local Partnership Board (LPB)
2. Complete a Needs Assessment
3. Develop a Domestic Abuse Strategy and commission appropriately
4. Monitor and Report to Government
5. Both Upper and Lower Tier Local Authorities to have regard to Statutory Guidance in exercising the above functions
6. Tier 2 (District) local authorities to co-operate with tier 1 (County) local authorities

2.6 The Ministry of Housing, Communities and Local Government (MHCLG) will allocate non-ring-fenced funding on an annual basis to support Tier 1 and Tier 2 local authorities to fulfil their statutory obligations with respect to this duty. For 2021/22 Gloucestershire County Council has been allocated £1,105,661 which includes funding for support to DA victims and their children in DA safe accommodation and the associated administrative burdens. The district councils have been allocated a combined total of £198,956 to cover their administrative burdens but if the proposed options are agreed, will also receive some of the Tier 1 allocation to commission on our behalf.

2.7 We are required to prepare a domestic abuse needs assessment and strategy every three years with an annual refresh. The deadline for the first strategy to be submitted to the DA Commissioner is August this year. We will also need to prepare an annual report on investment and impact with the first report due in June 2022.

Mechanism for Commissioning DA in Gloucestershire

3.1 In 2013, the Council re-commissioned DA specialist support services for victims as a community-based model enabling victims to stay in their own home where it is safe to do so, rather than through an accommodation-based support model of delivery (i.e. refuges). The model included a help desk, one to one support for victims across the spectrum of risk and group work support for victims aged 16+ in line with the government definition of DA. This enabled many more victims of DA to be supported. Children were considered within the context of the family.

3.2 In 2014, in response to government drivers, including that DA cannot be addressed by one agency alone, a new joint countywide strategic approach was developed for DA and sexual violence, accompanied by new governance arrangements. A Domestic Abuse and Sexual Violence (DASV) Commissioning Group was convened, made up of partner agencies that were investing in DA (Gloucestershire County Council (GCC), the Office of the Police and Crime Commissioner (OPCC), Gloucestershire Constabulary, District Councils, Gloucestershire Clinical Commissioning Group (CCG) and Probation. They developed a Gloucestershire Joint Domestic Abuse and Sexual Violence (DASV) Commissioning Strategy and Outcomes Framework (2014 - 2018). This strategy set out a

collective commitment by partners to a joint strategic vision, principles and commissioning outcomes for DA. The outcomes being sought were to:

- Focus on early help programmes (alongside specialist support for victims) for individuals and the whole family affected by DA
- Ensure health, social care and other professionals who are in contact with families vulnerable to DASV are confident and competent in their response to support them, creating environments for disclosure at all levels
- Provide a co-ordinated approach across partner agencies, aligning commissioning and delivery of DASV services to ensure effective and efficient use of resources.

3.3 The strategy was supported by an implementation plan, overseen by a multi-agency DASV Implementation Group. Although the strategy and outcomes framework (2014 – 2018) were due to be refreshed by 2019 it was agreed that, as the strategy remained relevant, it would be better to wait until the Domestic Abuse Bill had been passed before refreshing it to ensure that our commissioning captured any additional outcomes and duties as identified by the Act.

3.4 In 2018, to strengthen Gloucestershire's joint agency commitment and response to DA, the DASV Commissioning Group created a five-year DA Joint Commissioning Framework (DA Framework) to improve joint commissioning of DA services with partners at a strategic level and align current and future investment in DA across the county to:

- maintain the specialist approach for high risk victims and their families
- shift over time towards prevention and away from reactive crisis
- increasingly integrate provision and influence practice across the system
- support the development of a more confident system wide workforce
- collect shared robust intelligence

3.5 The DA Framework includes for the procurement of specialist DA services for victims 16+, places of safety, addressing perpetrator behaviour, young people 13+, early identification and workforce development activity and services to address stalking outside the context of DA. The DA Framework does not include commissioning activity for children under 13 years which is commissioned separately.

3.6 Funding for specialist DA services (which are not statutory) has been maintained over the period 2013-21.

Implementation of the Domestic Abuse Act Statutory Duties

4.1 With a strong history of partnership working and already established and adaptable governance structures, Gloucestershire is in a good position to implement the Act. We have already convened the new Domestic Abuse Local Partnership Board (LPB) which consists of multi-agency Strategic, Operational and Consultation Groups which report up to Safer Gloucestershire (with a dotted line to the Health and Wellbeing Board) and link closely with the Safeguarding Boards and the Sexual Violence Partnership Board amongst others. We have consulted with the LPB groups with regard to our statutory duty to provide domestic abuse support in refuge and other domestic abuse safe accommodation.

4.2 We have commenced work on our DA needs assessment and have commissioned 'Perpetuity' to carry out engagement and consultation work. Our statutory obligation is to carry out a needs assessment for accommodation based support but the Partnership has agreed that it would be beneficial to widen the scope to include: community based support; how we respond to perpetrators; the impact on children (light touch at the moment but we will pick this up in more detail at a later date); and the picture of stalking, honour based violence and forced marriage as well as the views of those with lived experience and the general community. We hope to have the needs assessment completed by mid July but early identification of themes will help us to start to build up a picture of need and inform our strategy development. Early findings indicate a need to explore our response to protected characteristic groups (in particular ethnic minorities and those who identify as Lesbian, Gay, Bisexual, Transsexual and Queer (LGBTQ)) as well as those with no recourse to public funds. Complex needs are also a theme linked to accommodation-based support.

4.3 Under normal circumstances we would wait until we have the outputs from the needs assessment and strategy process to make any decisions on long term investment. However, we need to be mindful that MHCLG will be looking to adjust funding for 2022/23 based on spend of this year's funding and if we wait until the needs assessment and strategy are complete we will have limited time to make commissioning decisions within year.

4.4 In light of this, we have gained agreement from the LPB to take a two-phase approach to allocation of the funding whereby we make an initial investment in services which we know improve outcomes for victims and then allocate the remaining funds once we have the intelligence from our needs assessment and have agreed a strategic direction.

4.5 A 'DA support in safe accommodation' options paper (see Appendix 1) was taken to the first meetings of the LPB outlining a range of options that could be considered within the DA safe accommodation agenda for possible investment. Further conversations have since taken place outside of these meetings with the District Councils, Providers and other stakeholders as well as with our internal support services to assess the feasibility of commissioning through the Framework and our current contracts. Some of the options have been discounted at this stage and others are considered to be longer term options which need further scoping before decisions can be made. Appendix 2 shows the options that are not being considered this year.

4.6 The LPB have made a recommendation for the following options to be progressed immediately with respect to commissioning accommodation-based support

1. Places of Safety (POS)	
Current provision	10 - 12 units. This offer is subject to a homelessness application, prioritising homelessness over DA risk.
Current Funding	Funding for the current POS (x12) is covered by existing grant funding for at least a further 3 years, this is managed by the Districts. The Floating Support for the scheme is delivered by GDASS; the funding for this is captured in option 5.
MHCLG investment	12 new POS properties (change over every 6 months) 24 clients per year. Includes specialist support and housing management
- Districts to	POS Scheme Costs:

<i>commission</i>	<p>Housing Officer Support hrs/ Management oversight hrs/ staffing on costs/ IT & phones/ training = £60,000</p> <p>Additional Costs: To enable tenancy access, sustaining tenancy & move on = £18,100, to be discussed/ agreed with MHCLG</p> <p>DA Floating Support Costs: Floating Support Hours: 10x 2.5hr support sessions per client & link worker support following move on 1hr a month for 3 months for 24 clients = £12,000</p> <p>TOTAL annual investment for 12 new PoS = £90,100</p>
Mechanism for commissioning	<ul style="list-style-type: none"> Districts to commission the PoS post via the DA Framework under Lot 2 – three-year contracts with one-year break clauses to account for annual funding allocation (recommendation 3) GCC to commission Floating Support Costs via modification of the current GDASS contract (recommendation 2)
Risks/issues	It is difficult to identify and allocate properties to the current Places of Safety scheme. Further negotiations will need to take place between District Councils and registered social landlords.

2. Dispersed Refuge	
Current provision	None currently in the county. These are self contained single units of accommodation available to all DA victim groups with high level specialist DA support provided. The specialist DA support could be attached to the units or commissioned via the GDASS contract. The routes to access and prioritisation for these units may be different to the Places of Safety. This accommodation would prioritise DA risk over a homelessness duty.
Current funding	£0
MHCLG Investment – GCC to commission	<p>Possibility of 2x 4bed units in Gloucester.</p> <p>Based on the CABS call off contract the estimated costs would be £25,000 - £30,000 per 4 bed unit per year. £50,000 - £60,000 for the 8 units</p> <p>Based on the POS costs above and initial conversations with a Lot 2 Provider the estimated costs for 8 units would be £40,000</p> <p>Estimated maximum TOTAL annual Investment = £40,000 - £60,000</p> <p>DA Floating Support Costs: Floating Support Hours: 10x 2.5hr support sessions per client & link worker support following move on 1hr a month for 3 months for 16 clients = £8,000</p>
Mechanism for Commissioning	<ul style="list-style-type: none"> GCC to commission via Lot 2 call off contract. Three-year contracts with annual break clauses (recommendation 3) GCC to commission floating support costs via modification of the existing GDASS contract (recommendation 2)

Risks / issues	Approach has been made to Providers on Lot 2 of DA Framework. Several Providers do not have properties in Gloucestershire and others do not have any self-contained properties available. Additional capital funding would need to be sought to support Providers in bringing additional properties to the market in Gloucestershire. One Provider has 2x 4 bed units that could be considered. Another provider is bringing new secured tenancy properties to the market and could consider change of use for this remit. Further conversations need to be had with registered social landlords.
----------------	---

3. Stroud Beresford Refuge (including support for children)	
Current provision	Gloucestershire's only women's refuge
Current funding	Charitable donations; Big Lottery Community Fund et al
MHCLG Investment – GCC to commission	£100,000 annual investment (27% of the total running costs of the Stroud Beresford Refuge/ approx. 70 staffing hours per week).
Mechanism for commissioning	GCC to commission via Lot 2 call off contract (recommendation 5)
Risks/issues	To consider if it is possible to extend the current support to children beyond refuge residents.

4. Flexible Funding Scheme	
Current provision	Part of the Whole Housing Approach, this is a funding pot (held by a coordinator within the specialist domestic abuse service) which offers timely and bespoke personalisation funding to victims of domestic abuse for housing related needs. The funds would allow the individual with their domestic abuse worker to apply for funding for goods or services that they identify would help them access or maintain accommodation. Flexible funding would be awarded if it met this purpose, regardless of eligibility or evidence of the individual's' financial circumstances or experience of abuse, providing other funding avenues did not meet the need or had rejected the application. This empowers the individual to be able to identify and meet needs or address barriers that might otherwise prevent them from accessing safe and secure housing, and without incurring a debt or financial burden through loans.
Current funding	£0
MHCLG Investment – GCC to commission	£40,000 annual investment (to include some legal costs) allocated through GDASS
Mechanism for commissioning	GCC to commission via modification of the current GDASS contract (recommendation 1)
Risks / issues	

5. Floating Support / Mobile Advocacy	
Current provision	Provided by GDASS
MHCLG	Floating Support Hours for the current 12x POS (change over every 6

Investment – GCC to commission	months) 24 clients per year: 10x 2.5hr support sessions per client & link worker support following move on 1hr a month for 3 months for 24 clients = £12,000
Mechanism for commissioning	GCC to commission via modification of the current GDASS contract (recommendation 2)
Risks/issues	Funding will be for staff so employment terms may need to be limited to annual contracts which may mean attracting and retaining staff is difficult.

6. Enabling access to Target Hardening/ Sanctuary and provide floating support	
Current provision	Part of the WHA, support element to be provided for victims/ survivors in receipt of security measures via this scheme.
Current funding	The scheme is currently funded by the Districts x6 and OPCC. The support element would be provided by GDASS as part of their service offer. – Commissioned by GCC
Investment – GCC to commission	150 clients per annum - 2hrs per client for housing options and completing Target Hardening/ Sanctuary referral = £4,263 Floating Support/ IDVA Hours: 8x 2.5hr sessions per client = £42,630 Oversight/ Management Hours: 1hr per client issue resolving, 1 hr per month case closure, 2hrs per quarter contract monitoring = £2,599 TOTAL annual Investment = £49,492
Mechanism for commissioning	GCC to commission via modification of the existing GDASS contract (recommendation 1)
Risks/issues	Consider if any growth is needed in this scheme going forward

4.7 The total maximum spend for these options is **£359,592**.

4.8 In addition to the above options, the Districts have agreed the following, which are likely to be actioned later in the year:

11. DA Intervention Post	MHCLG funding for this post due to end approx. March 2022	Districts to commission	£44,000 per post per annum including on costs Total annual investment = £88,000 recommendation 3	2 new posts 2021/22 in addition to the current funded post. Decision on number of roles required across all districts after the first year
12. Specialist DA Advocates in Housing Teams	Medium priority	Districts	Districts are unable to provide detail on estimated costs at this stage. They are recruiting new staff (using the burdens	Role would need to be connected to a DA specialist provider or affiliated to a national body for DA

13. DA Training for the Housing Sector		to commis sion	funding described in paragraph 2.6). Once these staff are in post work on options 12, 13, 14 (and option 1) will commence. Any identified funding may be required for these options from Qtr. 3 at the earliest.	Investment in Lot 5 of the DA Framework could be considered
14. DA Housing Champions			A rough Estimate for 2 x post +training is £100,000 recommendation 3	Low investment required – coordinator role to deliver alongside the current DA champions network

4.9 This brings the total to maximum spend per annum to **£447,592** (known costs) plus unknown costs for options 12, 13 and 14 (estimate maximum £100,000 per annum) which will be clarified once the initial posts are recruited to.

4.10 In our conversations with partners and providers we have identified that the year on year nature of the funding makes it difficult to recruit and plan ahead. We are proposing to offer three-year contracts with annual break clauses (where appropriate to do so) which would incentivise providers and offer some security without adding unacceptable risk to commissioners.

4.11 Tier 1 local authorities are expected to use some of their grant allocation against administrative burdens associated with implementing the statutory duty. We are proposing to use this money to fund 0.5WTE of the Consultation Coordinator post, a percentage of the current Domestic Abuse Outcome Manager and Domestic Abuse and Sexual Violence Coordinator posts and training for the Partnership Board and wider workforce. We have estimated that the maximum amount assigned to these costs will be £100,000 per annum (**recommendation 4**).

4.12 After investment in the accommodation based support options and administrative burdens noted above, we will look to invest the remainder of the grant (approximately £438,069 for 2021/22) once we have completed our needs assessment and strategy. It should be noted that if we are not able to allocate this money in year, MHCLG will look to adjust future year's funding. We will be looking for the LPB to make recommendations for the remaining funding in September 2021 and seek delegated authority to sign off these investment decisions to ensure that we can act on them as quickly as possible (**recommendation 7**).

Options

5.1 The following options have been considered:

- a) To proceed with putting in place the contractual arrangements described above with immediate effect to enable the County Council to meet their statutory obligations under the Domestic Abuse Act 2021 and maximise the MHCLG funding available for domestic

abuse accommodation based support in future years.

- b) Wait until we have the outputs from the needs assessment and strategy development to consider how we wish to invest the funding for 2021/22. This is not recommended because: any delay in providing accommodation based support will impact victims and their children at a time of rising need and waiting until the Autumn to make investment decisions will severely limit our ability to use the MHCLG funding in this financial year and will thus impact on the amount of funding we will receive in future years.
- c) Do nothing. This would not allow the Council to meet statutory obligations and meet the needs of victims of Domestic Abuse and their children, so this is not recommended.

5.2 We are recommending option a) in order to meet our statutory obligations to provide accommodation-based support within this financial year for victims of Domestic Abuse and their children and maximise the MHCLG funding available for this purpose in future years.

Risks

6.1 The following risks have been identified:

- For both options but particularly option b) there is potential for delays in decision making and governance processes which would result in limited investment of funding this year with a knock-on effect of reduced funding next year.
- We know that the consequence of being in lock-down during the COVID-19 pandemic has had a massive impact on victims of DA and demand is rising for support services. To delay investment would potentially waste an opportunity to increase availability of support to victims and their children and also introduce the risk of not meeting our statutory obligations with regard to providing support to victims and their children in DA safe accommodation.
- The annual funding mechanism increases the likelihood of it being difficult to attract providers. This report is recommending that this is mitigated by offering longer call-off contracts with annual break clauses. This would offer both providers and commissioners a great degree of certainty without committing us beyond our means.
- There is a risk that Tier 2 partners are not ready to commission within the time frame we are looking for. To mitigate this we are engaging with the districts through the LPB and the Strategic Housing Partnership.
- There is some risk in our ability to align the support elements of the contracts with the Tier 2 commissioning as this is dependent on how districts deliver their grant. As above, we are engaging with the districts through the LPB and Strategic Housing Partnership to ensure that this worked is progressed as soon as possible.
- The MHCLG funding is not ring-fenced and there is no guarantee that the level of funding will remain the same year on year.
- The Council will procure services where possible using the existing Domestic Abuse Support Services Framework which enables the Council to run compliant mini

competitions with providers on the framework and compliant non-competed options. The modification of the Lot 1 GDASS contract, is permitted under Public Contracts Regulations (2015) Regulation 72(b) which allows for the contract to be modified due to the significant inconvenience or substantial duplication of cost as long as the circumstances would not have been foreseen, the overall contract nature of the contract hasn't changed and the increase in price does not exceed 50% of the original value. The complexity of the contract means that an award to anyone other than the incumbent Provider would cause significant inconvenience and a substantial duplication of costs. As the COVID pandemic and its effects could not have been predicted, the nature of the overall contract is not changing and the price increase is under 50% of the original contract the tests are met to modify the contract. All Public Contract Regulations reporting requirements will be met.

Financial implications

7.1 The investment required to implement the recommendations is within the 2021/22 MHCLG Grant allocation. MHCLG funding will be made available on an annual basis as long as the statutory duty exists however, as indicated above, the funding is not ring-fenced and there is no guarantee that the level of funding will remain the same.

7.2 If we make commissioning decisions based on year on year availability of funding this is likely to be more expensive to us. As indicated above, mitigation for this would be to offer longer contracts with annual break clauses which would make it more attractive to providers and give both them and us more certainty.

Climate change implications

8.1 Carbon Emissions Implications? ~~Positive~~/ Neutral/ ~~Negative~~

8.2 Vulnerable to climate change? ~~Yes~~/ No/ ~~Maybe~~

Equality implications

Has an Equalities Impact Assessment (EIA) been completed? Yes / ~~No~~

9.1 The Equalities Impact Assessment (EIA) originally produced to support the decision to create a Joint Commissioning Framework for Domestic Abuse (2017) is linked in the background documents. We have a statutory duty to produce a needs assessment every three years and within this we are required to pay particular regard to protected characteristics and intersectionality. Once the DA Needs Assessment has been completed, the EIA will be updated accordingly and will inform decisions about how the remainder of the grant is used.

9.2 The investments being recommended in this report will support greater access to domestic abuse services across both accommodation and community-based support for all victims and their families. This proposal does not discriminate against any of the protected groups and actively seeks to ensure equality of opportunity to improve outcomes for all.

9.3 Cabinet Members should read and consider the Equalities Impact Assessment in order to satisfy themselves as decision makers that due regard has been given.

Data Protection Impact Assessment (DPIA) implications

10.1 All bidders for call off contracts under the Domestic Abuse Strategic Commissioning Framework must complete Security Standards Forms as part of the bidding process. All current contracts on the Framework have completed DPIA assessments

Social value implications

11.1 Opportunities to maximise economic and social benefits beyond the scope of the commissioned activity will be included in the service specifications, invitation to tender and monitoring requirements for the investments we are making.

Consultation feedback

12.1 The Domestic Abuse Needs Assessment will inform our future investment decisions around the DA agenda and as part of the process of preparing it we have commissioned an external consultancy to carry out an engagement and consultation exercise with particular emphasis on protected characteristics and intersectionality.

12.2 The structure of the new DA Local Partnership Board includes a consultation group made up of individuals with lived experience and other stakeholders. The expectation is that the learning and feedback from this group will be threaded through the work of the LPB and any future commissioning decisions.

Officer recommendations

13.1 Officer advice is to agree the recommendations set out in this report to proceed with option a).

Performance Management/Follow-up

14.1 Local authorities will have a duty to submit annual reports to central Government. The first report is due in June 2022.

14.2 A ministerial-led National Expert Steering Group will be established to monitor and evaluate delivery of the new duty. This Group will include representatives from local government, Police and Crime Commissioners, health bodies, specialist domestic abuse service providers and housing associations. The Domestic Abuse Commissioner will also be a member.

14.3 Individual contracts within the DA Joint Commissioning Framework are managed by GCC, the Office of the Police and Crime Commissioner (OPCC), Gloucestershire Clinical Commissioning Group (GCCG) and the District Councils. Regular contract management and reporting processes are in place and reporting will be managed through the normal governance processes in addition to the DA LPB governance. We report DA KPI's internally within GCC and are working with the performance team to develop a corporate DA indicator.

14.4 The DA LPB will report up to the Safer Gloucestershire Board and inform the Health and Wellbeing Board.

Appendix 1

Gloucestershire Domestic Abuse LPB Strategic Group

Agenda Item 6:	MHCLG Funding Allocation for Gloucestershire 2021/22: Funding options for support to domestic abuse victims and their children in Domestic Abuse (DA) Safe Accommodation
Meeting Date	Monday 26 th April 2021
Author	Tina Hemingway
Item for decision or information?	For decision
Key Issues:	
<p>The Domestic Abuse Bill places a duty on Local Authorities in England to provide support to victims of DA and their children in domestic abuse safe accommodation.</p> <p>The MHCLG will allocate non ring-fenced funding on an annual basis to support Tier One and Tier Two local authorities to fulfil their statutory obligations with respect to this duty. For 2021/22 Gloucestershire County Council has been allocated £1,105,661 which includes funding for support to DA victims and their children in DA safe accommodation and the associated administrative burdens. The district councils have been allocated a total of £198,956 to cover their administrative burdens.</p> <p>We are required to prepare a domestic abuse needs assessment and strategy by August 2021 and under normal circumstances we would wait until we have the outputs from this process to make any decisions on long term investment. However, we need to be mindful that MHCLG will be looking to adjust the next year's funding based on how we have used this year's funding and if we wait until the needs assessment and strategy are complete we have limited time to make commissioning decisions within year.</p> <p>In light of this, we are proposing to take a two-phase approach to allocation of the funding whereby we make an initial investment in areas which we already know, through our collective knowledge, improve outcomes and then allocate the remaining funds once we have the intelligence from our needs assessment and have agreed a strategic direction.</p> <p>This paper summarises the options for investment to help Board members consider the best approach to our initial spend.</p>	
Recommendations to Board:	
<p>We would like the Board to indicate:</p> <ul style="list-style-type: none"> • their support for a two-phase approach to investment of the MHCLG funding • their views either for or against the options laid out in the table 	
Financial/Resource Implications:	
<ul style="list-style-type: none"> • As detailed above 	

MHCLG Funding Allocation for Gloucestershire 2021/22 Funding Options for Domestic Abuse (DA) Safe Accommodation

Introduction

The Domestic Abuse Bill places a duty on Local Authorities in England to provide support to victims of DA and their children in refuges and other safe accommodation. The definition of 'safe accommodation' has been kept fairly broad to include: specialist safe accommodation; dispersed accommodation; sanctuary schemes; and move-on or second stage accommodation amongst others. The duty includes a requirement to:

- Provide all eligible homeless victims of domestic abuse automatic 'priority need' for homelessness assistance.
- Ensure that where a local authority, for reasons connected with domestic abuse, grants a new secure tenancy to a social tenant who had or has a secure lifetime or assured tenancy (other than an assured short hold tenancy) this must be a secure lifetime tenancy.

The types of support provided through the new duty to victims of DA and their children while in DA safe accommodation, include:

- Advocacy support – development of personal safety plans, liaison with other services (for example, GPs and social workers, welfare benefit providers);
- Domestic abuse-prevention advice – support to assist victims to recognise the signs of abusive relationships, to help them remain safe (including online) and to prevent re-victimisation;
- Specialist support for victims with protected characteristics and/ or complex needs, for example, interpreters, faith services, mental health advice and support, drug and alcohol advice and support, and immigration advice;
- Children's support – including play therapy and child advocacy;
- Housing-related support – providing housing-related advice and support, for example, securing a permanent home and advice on how to live safely and independently; and
- Counselling and therapy for both adults and children.

The MHCLG has allocated Gloucestershire County Council £1,105,661 for 2021/22 in relation to this duty which includes some funding for the associated administrative burdens. District Councils have been allocated the following amounts to cover their administrative burdens only:

Cheltenham	£33,524
Cotswold	£33,790
Forest of Dean	£31,748
Gloucester	£32,639
Stroud	£32,440
Tewksbury	£34,815
Total	£198,956

Understanding the Accommodation Landscape in Gloucestershire

In order for us to be able to prioritise investment and commission appropriately we need understand current provision and any gaps we might have. The table below is a summary of work that has been completed to get an understanding of the current safe accommodation offer across Gloucestershire.

	Emergency	Temporary/ short term	Move on/ long term
Specialist DA Safe Accommodation	Places of Safety (x12 units) Refuge (x9 bed spaces)		Own home with Target Hardening or Sanctuary GreenSquare – move on accommodation (x12 units tbc)
General Access Safe Accommodation	B&B (x93) Rapid Housing Pathway	Hostel (x83) Assessment Centre (x14) Temporary Accommodation – self contained flats	ABS: 16+ (x141), 18+ (x190), mental health (x40), young parents (x19) Move On Accommodation Social Housing

In addition to this work, as required by Government we are preparing a DA Needs Assessment but this will not be available until July 2021. It should be noted that as part of the Needs Assessment we will be required to consider the offer for DA victims who present from outside of Gloucestershire.

Options for Investment

In advance of getting a full understanding of the current offer and level of need (met and unmet), we have considered the areas within the DA safe accommodation agenda for possible investment.

I would suggest that we take a two phased approach to investing the MHCLG allocated funding. While it is clear that we will be expected to meet our new statutory duties to provide support to victims of DA and their children in DA safe accommodation from April 2021, any decision about long term investment in this area will need to consider:

- The DA Needs Assessment for Gloucestershire that is required by Government

- The Domestic Abuse Strategy for Gloucestershire that is also required by Government and will be published (anticipated time frame Aug 2021)
- Availability of the MHCLG funding which is currently only made available on an annual basis with no guarantee of future funding levels (although there is a commitment to fund whilst the statutory duty exists)
- It is also worth noting that the MHCLG funding that tier 1 local authorities receive is not ring fenced for DA

Below are a range of funding/ investment options to consider supporting Gloucestershire in meeting its statutory duties.

Options	Priority/ Timeframe	Lead	Investment level	Risks/ Issues
1. Places of Safety (12 units)	High Priority Fund in 2021/22	Joint: Districts & GCC	Districts to advise based on the current PoS model	Difficult to identify and allocate properties to the current scheme, alternative approach to be considered with Providers on Lot 2 of DA Framework
2. Dispersed Refuge (12 units)				
3. Stroud Beresford Refuge (including support for children)	High Priority Fund in 2021/22	GCC	Unknown, need to understand current reliance on annual MHCLG funding	Need to consider if it is possible to extend the current support to children beyond refuge residents
4. Flexible Funding Scheme	High Priority Fund in 2021/22	GCC	Unknown, to discuss with Districts & GDASS	None
5. Floating Support/ Mobile Advocacy	High Priority Fund in 2021/22	GCC	Work with GDASS to understand current costs to be covered. Additional funding will depend on other options we invest in	Funding will be for staff so employment terms may need to be limited to annual contracts which may mean attracting and retaining staff is difficult
6. Support for clients receiving Target	High Priority Fund in 2021/22	GCC	Work with GDASS to understand current costs	Consider if any growth is needed in this scheme going forward

Hardening/ Sanctuary measures			for approx. 200 clients per year	
7. Managed Reciprocal's	For districts to consider and advise ?2021/22	Districts via Programm e Managem ent Team	Low investment required – coordinator role	Low risk, this approach may already be in operation
8. Private Sector Leasing Scheme	For districts to consider and advise ?2021/22	Districts	Districts to advise	
9. Emergency Accommodati on	For districts to consider and advise ?2021/22	Districts	Districts to advise	
10. Move On Accommodati on	For districts to consider and advise ?2021/22	Districts	Districts to advise	Other funding streams exist – Homes England CME programme
11. DA Intervention Post	MHCLG funding for this post due to end approx. March 2022	Districts	Districts to advise	
12. Specialist DA Advocates in Housing Teams	Medium priority Consider 2022/23	Districts	For districts to consider and advise	Role would need to be connected to a DA specialist provider or affiliated to a national body for DA
13. DA Training for the Housing Sector	Medium priority Consider 2022/23	Districts	For districts to consider and advise	Investment in Lot 5 of the DA Framework could be considered
14. DA Housing Champions	Medium priority Consider 2022/23	Joint: Districts & GCC	Low investment required – coordinator role	To include as part of the current DA champions network
15. DA Perpetrator Management	Medium priority Consider 2022/23	Joint: Districts & GCC	For districts to consider and advise	Need to ensure connections with PRG
16. DA Support for Children	Medium priority Consider 2022/23.	GCC	Need to consider with CSC commissioners	The scope of the planned DA needs assessment does not include under 16

17. Intensive Housing Management	Longer term decision needs to be informed by the DA Needs Ass	Joint: Districts & GCC		
18. Housing First/ Housing Led Model	Longer term decision needs to be informed by the DA Needs Ass	Joint: Districts & GCC		
19. Specialist DA Accommodation	Longer term decision needs to be informed by the DA Needs Ass	Joint: Districts & GCC	Would require high investment	Issues with funding only being guaranteed on an annual basis
20. Safe Space, Wrap-around care accommodation	Longer term decision needs to be informed by the DA Needs Ass	Part of the complex needs agenda	Unknown, would be a contribution to the whole model	This would be an approach for complex needs that could include DA victims

Further Considerations

- The MHCLG funding is specifically for DA safe accommodation not generic safe accommodation, but the grant is not ring fenced, there is however an expectation that this funding is spent on delivering the statutory duties.
- Gloucestershire is part of the national refuge network; we need to be clear what our contribution to this network is and how this is accessed from outside of Gloucestershire.
- Need to consider accessibility for protected characteristic groups i.e. BAME, LGBT, disabled, deaf, older.
- Consider service development that is informed and led by victims or protected characteristic groups (by and for approach).
- All decisions to be informed by the voice of the victim (some of the tier 1 administrative burdens funding will be used to fund a Consultation Group Co-ordinator that will lead on voice of the victim).
- The Domestic Abuse Bill/ Act promotes the Whole Housing Approach (WHA), the government is likely to seek evidence of this approach in the DA needs assessment and resulting DA Strategy and commissioning approach. The WHA includes; DAHA accreditation flexible funding, mobile advocacy, Sanctuary, perpetrator management, managed reciprocals. For Districts to consider what additional investment is needed across different aspects of the system to look at the scope of this activity and implementing aspects of the WHA.

- Need to ensure that there is adequate capacity in the housing sector going forward to be able to facilitate the DA agenda, including; promoting the strategic DA agenda, leading on the Whole Housing Approach (WHA), development of DA Housing Pathway, commissioning and contract management activity, data collection and analysis, oversight of training, dealing with issues and blockages in the housing pathway, engagement with the private rented/ owned sector.
- Consider the need for investment to support DA victims with No Recourse to Public Funds in accessing DA safe accommodation. Need to confirm if the MHCLG funding can be used in this way or if there is alternative funding for this group.

Description of the Options Presented

- 1. Places of Safety:** Development of the current Places of Safety model with the addition of at least 24 new units with specialist support and housing management. To discuss possible options with the Districts (who commission the current model via GreenSquare) and Providers awarded to Lot 2 of the DA Commissioning Framework. This offer is subject to a homelessness application, prioritising homelessness over DA risk. – Joint commissioning
- 2. Dispersed Refuge:** These are self contained single units of accommodation available to all DA victim groups with high level specialist DA support provided. The specialist DA support could be attached to the units or commissioned via the GDASS contract. The routes to access and prioritisation for these units may be different to the Places of Safety. This accommodation would prioritise DA risk over a homelessness duty. – Joint commissioning
- 3. Stroud Beresford:** Consider what investment is required by the current refuge in Gloucestershire. Also consider the expansion of the children’s play worker offer – Commissioning by GCC
- 4. Flexible Funding Scheme:** Part of the WHA, this is a funding pot (held by a coordinator within the specialist domestic abuse service) which offers timely and bespoke personalisation funding to victims of domestic abuse for housing related needs. The funds would allow the individual with their domestic abuse worker to apply for funding for goods or services that they identify would help them access or maintain accommodation. Flexible funding would be awarded if it met this purpose, regardless of eligibility or evidence of the individual’s’ financial circumstances or experience of abuse, providing other funding avenues did not meet the need or had rejected the application. This empowers the individual to be able to identify and meet needs or address barriers that might otherwise prevent them from accessing safe and secure housing, and without incurring a debt or financial burden through loans. – Joint Commissioning led by GCC
- 5. Floating Support/ Mobile Advocacy:** Part of the WHA, increasing investment in the current community based model to cover the cost of current support in DA safe accommodation settings and facilitate additional capacity to offer support in any new

DA safe accommodation settings and to provide additional capacity for additional referrals from housing. – Commissioning by GCC

- 6. Target Hardening and Sanctuary Scheme:** Part of the WHA, support element to be provided for victims/ survivors in receipt of security measures via this scheme. The scheme is currently funded by the Districts x6 and OPCC. The support element would be provided by GDASS as part of their service offer. – Commissioned by GCC
- 7. Managed Reciprocal's:** Part of the Whole Housing Approach (WHA), social housing tenants can have planned but expedient move away from an area where they are at risk of domestic abuse, to an area that they have identified would meet their needs, without losing their security of tenure, whilst also balancing demand on providers and receiving districts. This could be beneficial in Gloucestershire to ensure equity of moves across six districts through multiple registered providers with varying levels of stock. We would need to understand the willingness of social housing providers to support this approach (Is this approach already taken as part of the Homeseekers Policy?) – Commissioning by Districts)
- 8. Private Sector Leasing Scheme:** The local authority leases properties from private landlords to use as temporary accommodation, as well as carrying out the property management functions. Private sector leasing could provide a range of accommodation types and sizes across the county, rather than relying on where registered providers hold stock, which would give more flexibility in meeting the housing and safety needs identified by victims of domestic abuse while waiting for a long-term housing solution. – Commissioning by Districts
- 9. Emergency Accommodation for DA victims:** It is suggested by the Districts that at any given time they have approximately 100 DA victims in emergency and temporary accommodation. To work with the Districts to consider the current temporary accommodation offer and what might be needed in terms of increasing the capacity and suitability of emergency accommodation options for DA victims. Noting that for the MHCLG funding to be used for this purpose the accommodation would have to be DA specific, self contained and safe. – Commissioning by Districts
- 10. Move On Accommodation:** To increase the volume of move on permanent accommodation in Gloucestershire to facilitate a faster throughput of the specialist DA accommodation. To work with the Districts to consider the move on accommodation that is currently available in Gloucestershire and consider what additional capacity might be needed to support DA victims with a timely move on to settled accommodation. (Engagement with social housing providers – GreenSquare purchasing 12 properties) - Joint commissioning led by Districts
- 11. DA Intervention Post:** Supports complex cases in temporary accommodation to look at longer term and sustainable accommodation solutions
- 12. Specialist DA Workers in Housing Teams:** IDVAs or specialist DA support workers in housing teams. These could be specialist DA workers that housing teams

employ and manage directly or they could be specialist staff from a DA service that are co-located in the housing teams. Scope, function and volume of the role would need to be discussed with the Districts. - Commissioning by Districts

13. DA Training: Development of a training pathway for housing professionals including; DA awareness, DA housing protocol, risk assessment & DASH completion, safety planning and addressing DA, to be considered across the housing sector. Investment in the development and delivery of training for the housing sector. This could be commissioned through Lot 5 of the DA Commissioning Framework. – Commissioned by Districts

14. DA Housing Champions: role out the professional DA Champions network within the housing sector. Additional investment would be needed to support GDASS or an alternative provider to develop and support this approach within housing on an ongoing basis. – Joint commissioning led by Districts

15. Domestic Abuse Perpetrator Management: Part of the WHA, consideration to be given to the accommodation needs of perpetrators of DA to reflect our model that where appropriate and safe to do so the victim and children are enabled to stay in the family home with the perpetrator needed to seek alternative accommodation arrangements. To discuss with District colleagues how this is proactively managed and any additional investment that might be needed in the system to support this approach. To ensure that any housing approach that proactively engages with perpetrators of domestic abuse, considers the offer of support that is available through the county's commissioned perpetrator service (Positive Relationships Gloucestershire). Also consider the impact of the new DAPO/ DAPN, when these come into effect. For the housing sector as a whole to take a proactive approach to DA perpetrator management ensuring understanding of how the proactive management of a perpetrator will contribute to the safety of a victim and their children. Need to understand if there are any resources or training needs across the housing sector as a whole to facilitate this approach. – Joint commissioning led by Districts

16. DA Support for Children: Consider what support is needed for the children on DA victims receiving support in DA safe accommodation. Need to fully understand the accommodation where accessing this support is appropriate i.e. in a Refuge. Need to understand the scope of the support that it would be appropriate to offer. To work with the CSC Commissioning colleagues to consider what is currently available in Gloucestershire and consider what additional or new capacity might be needed to support the children of DA victims in safe accommodation. – Commissioned by GCC

17. Intensive Housing Management Model: Provision of properties owned or leased by a local authority, charity or registered provider which could serve as second stage accommodation option or as longer term move-on accommodation for victims of domestic abuse who need a level of support from their landlord beyond that of basic property management functions in order to maintain their tenancy. Would need to work with the Districts to understand the demand for this approach and the benefits that this would bring for victims of DA and the housing system as a whole – Joint commissioning led by Districts

18. Housing First or Housing Led Model: It may be appropriate to consider these approaches for domestic abuse victims with complex needs who DA services have previously found difficult to engage. These clients may be more difficult to place in traditional refuge placements and may find a dispersed refuge or place of safety offer difficult to manage. High intensity support would be provided to secure a long term tenancy, while noting that the model does not require the client to engage with support. A wrap around flexible, responsive support package would be provided to adjust to the specific needs of victims over time, while ensuring that they have the security of their own accommodation which continues even after the need for support ends. Housing would typically be offered through social landlords so that there is an offer of permanent housing, and an affordable rent. This approach does require having providers who are willing to deliver to this model. – Joint Commissioning

19. Specialist DA Safe Accommodation: This is specialist accommodation is for specific groups of DA victims i.e. specialist refuge provision for LGBT, BAME, disability, multiple complex needs. The support provided will be bespoke for a specific identified group. We would need the full detail of the DA Needs Assessment prior to making any decisions about investment in this specialist support. – Joint commissioning

20. Safe Space, Wrap-around Care Accommodation: In relation to adults experiencing multiple disadvantages, the ambition would be to create asset-based, wrap around support to complement and enhance the current pathway of services and help people with complex needs to feel safe and listened to. This would be through: building a 'multiple agency/expertise' in-reach and outreach workforce, especially targeting those clients not in touch with specialist services; and creating safe spaces for those who need a stable environment in order to engage with in/outreach staff as needed on their journey

Summary

In the context of our current community based support model, we are looking to make initial investment decisions that will help support our statutory obligations whilst we undertake our full needs assessment and consider any recommendations. We would like the Board to indicate:

- their support for a two phase approach to investment of the MHCLG funding
- their views either for or against the options laid out above

Appendix 2: Options not being considered in 2021/22

The options below are NOT being considered as part of the 2021/22 MHCLG funding allocation				
7. Managed Reciprocal's Districts	<i>Decision not to progress:</i> Not clear that there is currently demand and while some value was recognised this could possibly be met by operational policies through the statutory framework as agreed between districts.			
8. Private Sector Leasing Scheme Districts	<i>Decision not to progress:</i> Not realistic to mobilise a new service within timelines. There may be scope to utilise accommodation through an existing district partnership contract. This can be explored further in due course.			
9. Emergency Accommodation Districts	<p><i>Decision to not progress:</i> can be explored further following the outcome of the needs assessment. The expansion of the Domestic Abuse Intervention Officer post (Option 11) will provide support to victims in emergency accommodation.</p> <p>We are open to further exploration of this option following the needs assessment e.g. if there is a need for an emergency accommodation unit tailored to specific needs. We will also need to monitor the demand for emergency accommodation through Homelessness Reduction Act applications.</p> <p>The preferred delivery of emergency/temporary accommodation is the Places of Safety/Dispersed Refuge model.</p>			
10. Move On Accommodation Districts	<p>Not a priority for this financial year.</p> <p>We may in future want to seek a support officer(s) to work specifically with move-on options but this is not a current priority.</p>			
15. DA Perpetrator Management	Medium priority Consider 2022/23	Joint: Districts & GCC	For districts to consider and advise	Need to ensure connections with PRG
16. DA Support for Children	Medium priority Consider 2022/23	GCC	Need to consider with CSC commissioners	The scope of the planned DA needs assessment does not include under 16
17. Intensive Housing Management	Longer term decision needs to be informed by the DA Needs	Joint: Districts & GCC	For districts to consider and advise once the needs assessment is complete	

	Ass			
18. Housing First/ Housing Led Model	Longer term decision needs to be informed by the DA Needs Ass	Joint: Districts & GCC		
19. Specialist DA Accommodation	Longer term decision needs to be informed by the DA Needs Ass	Joint: Districts & GCC	Would require high investment	Issues with funding only being guaranteed on an annual basis
20. Safe Space, Wrap-around care accommodation	Longer term decision needs to be informed by the DA Needs Ass	Part of the complex needs agenda	Unknown, would be a contribution to the whole model	This would be an approach for complex needs that could include DA victims