



To: 1. Minister for Safeguarding
2. Home Secretary

From:

NR	Public
Protection Unit	I&S

SCS: Shehla Husain
Date: 19 June 2020

SUCCESSFUL APPLICANTS TO THE £2M HMT DOMESTIC ABUSE CHARITIES' FUND

Issue

This submission seeks your agreement to make 14 funding awards to domestic abuse charities: 13 to successful bidders to the £2 million fund from HMT, and one from the original £2 million fund for domestic abuse helplines and online services. It also seeks your approval to reopen the £2 million HMT fund to a broader range of organisations.

Timing: Urgent – A reply by **22 June** would enable us to inform successful bidders and agree grant agreements with them, as a precursor to making initial payments by 30 June.

Recommendations

That you:

1. **Agree** to pay £780,521 from the HMT £2 million fund to 13 DA charities which passed the assessment. [paragraph 6]
2. **Agree not** to fund Paladin National Stalking Advocacy Service because of its financial weakness. [paragraph 8]
3. **Note** the details of the eight charities which failed the assessment. [paragraphs 9 and 11]
4. **Agree** to reopen the remainder of the fund to all charities which undertake DA activity, even if that is not their principal work. [paragraph 13]
5. **Agree** to pay Thames Valley Partnership £80,000 through a direct grant from the previous £2 million funding pot to create a webpage/desktop version of their BrightSky app. [paragraph 15]

Devolution implications: Yes

Has the use of analysis/ evidence/ data/ statistical information in this submission been agreed by Home Office Analysis and Insight? N/A

Equality Duty: all decisions made by the Home Office need to be taken with due consideration for the impact on people with protected characteristics, as per the Public Sector Equality Duty.

Has a Policy Equality Statement been completed? Yes

Has the central Home Office finance team been consulted? Yes

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Has relevant legal advice been received? Yes

Media interest: High

Opportunity for proactive media: Yes

Annex A: Updated Policy Equality Statement

Background

1. **The Home Office received £2 million for domestic abuse (DA) from the £750 million of funding which was made available to charities.** This sat alongside £15 million for MoJ to allocate to local DA charities through PCCs, and £10 million for MHCLG to allocate to DA accommodation services. Our funding was targeted at DA services which were not eligible for those other two pots, namely those with a national or regional focus and those which support statutory agencies or other charities. On 5 June MHCLG announced awards representing £8.15 million of its funding pot, and have reopened the remainder of the fund. MoJ officials sent advice on their allocations to their Ministers last night and plan to announce awards early next week.
2. **Our bidding window closed on 8 June and we received 22 applications.**¹ Each of them underwent an initial eligibility assessment, with a second pair of eyes check for those which it was proposed to fail, and those which passed that then underwent a full assessment by two assessors, with a moderation process in cases of disagreement. We have carried out full due diligence checks on those organisations which we propose to fund, and have confirmed that there would be no double funding of organisations which applied both to our pot and to MoJ's and/or MHCLG's, or with our own separate funding to DA organisations.
3. **The following organisations passed the assessment:**

Applicant	Proposed award	Basis of funding request
Muslim Women's Network UK	£15,764	Working from home equipment, and staff costs for additional counselling sessions
Suzy Lamplugh Trust (lead stalking charity)	£20,598	Staffing costs, partly reflecting income lost because of the pandemic, partly reflecting increased and more complex demand
AVA – Against Violence and Abuse	£47,490	Additional staffing costs reflecting (pandemic-related) lost income, increased demand and the need to convert face to face courses into online ones; associated equipment and design costs.
SafeLives	£96,800	Personnel costs (staff, and the survivors who work with them) reflecting increased demand and the need to design tech. versions of existing activities, with associated IT costs. Additionally, equipment costs to facilitate working from home.
Karma Nirvana (lead "honour"-based abuse charity)	£11,499	Equipment costs to facilitate working from home
Welsh Women's Aid	£105,733	Staff costs reflecting (pandemic-related) income loss, lower productivity from childcare etc. responsibilities for staff working remotely and increased demand; also associated phone charges and clinical supervision costs for staff.
Refuge	£65,393	A range of activities covering increased staffing costs for the national helpline, funds to improve their website and tech. services,

¹ Excluding a 23rd application for £2m which was wholly out of scope.

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		associated equipment costs, welfare support for staff, and a new three month post to assess the impact of the pandemic on victims.
Kids Out (helps children in women's refuges)	£130,000	Cost of food vouchers to be distributed to children in women's refuges.
Surviving Economic Abuse	£60,292	Staffing and IT costs to enable the conversion of their face to face courses into online ones, and equipment costs to facilitate working from home.
The Vavengers (a small charity focused on tackling FGM)	£12,380	Staffing costs reflecting pandemic-related loss of income and projects to help FGM survivors, refugees and asylum seekers adversely impacted by the pandemic.
Advocacy After Fatal Domestic Abuse (AAFDA - works with families who have been bereaved by domestic abuse)	£75,616	Staffing costs (reflecting pandemic-related loss of funding and increased demand) and associated equipment costs
Standing Together Against Domestic Violence (supports other charities in tackling DA)	£83,956	Staffing costs, replacing income lost because of the pandemic
Hollie Gazzard Trust (stalking charity)	£55,000	Provision of £80 vouchers to all but one ² of the PCC areas in England and Wales for them to offer to victims of stalking and DA. This will allow those victims to use the Hollie Guard app, a phone app which allows victims to discreetly alert their contacts that they are at risk. The vouchers pay for staffing costs, the costs of text messages for the app, and associated literature and communications activities.
Total	£780,521	

4. **The bid from Hollie Gazzard Trust should directly help to improve the police's response to DA.**
5. **The above amounts are those for which the organisations bid, with the following exceptions:**
 - **AAFDA** had claimed an additional £28,862 for bid writing and additional administrative support, which we did not consider a good use of public funds.
 - **Standing Together Against Domestic Violence** claimed £7,200 to pay the 20% remaining costs of a furloughed member of staff. To pay this would undermine the furlough scheme.
 - **Hollie Gazzard Trust** claimed £101,942, but this would leave them heavily dependent on Home Office income. The proposed £55,000 award would represent just under 50% of their most recent annual income, the standard maximum.
6. **We recommend that you agree to pay the proposed sums to these 13 organisations.** The initial payments, representing 50% of the sum, would be made on 30 June (subject to recipients completing the necessary grant paperwork for us), with two further payments in arrears following in September and November.

² Gloucestershire, where they are based, and to whose police force they have already made the vouchers available

7. **Paladin National Stalking Advocacy Service applied for £137,382 and passed the non-financial parts of the assessment.** However, although they have lost some funding because training courses are no longer possible during the pandemic, they have also lost more than three times as much as that because they chose not to apply for continuation of their existing funding from the National Lottery, having received a steer that the Lottery would now be focusing on Covid-related projects. They are clear that if they do not shortly receive additional funds they will have to close in September.
8. **This represents poor financial and risk management and means that the Home Office would be supporting a charity which was financially unsound for reasons other than Covid, which is not the purpose of this funding.** Funding them could lead to reputational damage, especially if they were still to collapse. Paladin, who are the lead sponsors of a register for serial DA and stalking perpetrators, which campaigners are pursuing through the DA Bill and other channels, might claim that we had not funded them for political reasons, whereas we are funding two stalking charities (Suzy Lamplugh Trust and Hollie Gazzard Trust) which are less critical of Government. However, there is a clear financial case not to do so and we recommend that you agree not to fund them.
9. **The following organisations failed the pre-assessment:**
 - Hestia Housing and Support
 - Thames Valley Partnership
 - Nottingham Counselling Service
 - Serenity Counselling
 - Safer Wales
10. **Hestia and Nottingham Counselling Service failed solely because they are not charities whose primary purpose is DA.** The fund was restricted to such charities, rather than to broader-based charities with a DA arm, because there was a risk of a large number of applications from non-DA charities which could have crowded out bids from DA-focused ones, which are likely to be at greater financial risk because of their narrower focus. The Domestic Abuse Commissioner warned of the risk of being “inundated” with such bids. Several DA-focused charities (such as Women’s Aid, Imkaan and Southall Black Sisters) which we might have expected to apply, and which were on the stakeholder lists with which we publicised the fund, did not do so, leaving the majority of the fund unspent. We cannot be certain why such organisations did not apply, but we understand from the Domestic Abuse Commissioner that some of the larger organisations had been approached by other funders (outside government) for longer-term grants.
11. **The following organisations, which are DA charities, failed the full assessment:**
 - Respect
 - Mankind
 - WHAG (formerly Woman’s Housing Action Group)

The reasons were essentially that the applications did not sufficiently make out the case for funding.

12. **Rejection of Hestia could create handling risks, as we are funding them from the original £2 million pot for DA helplines and online services (whose parameters are less strict), as could rejecting both Mankind and Respect, the two applicants which are focused on male victims.** Mankind is often critical of what they say is the Government's neglect of male victims. We have already funded Respect through the original £2 million pot and from separate funding for perpetrator programmes. The restriction of the fund to DA-focused charities has also attracted criticism from Victim Support, which would otherwise have bid, as would Barnardo's and maybe others.
13. **We therefore recommend that we reopen the fund (£1,219,479) for a further fortnight, this time widening the scope to all charities which do any work on DA, while making it clear that they could bid in relation only to their DA work.** This would mute criticism from Hestia and Victim Support, enable those charities which failed this round to reapply (taking into account the feedback which we will give them on their bids) and help to ensure that the remaining funds reach DA victims. We would proactively promote the fund as far as possible, highlighting the expansion of the scope, and would individually alert organisations which we currently fund to it. We recommend that you agree to reopen the fund with expanded eligibility as specified.
14. **It is hard, though, to estimate the number of additional bids which we would receive in the second round.** There is therefore a real risk of an underspend even after a retender.
15. **We consider that we could, though, fund Thames Valley Partnership's (TVP) (£80,000) bid from the original £2 million fund for helplines and online services, removing the need for them to bid again.** That pot was focused on technology, which TVP's bid is in a way which the other failed bids are not. Their bid would involve the creation of a webpage/desktop version of their "BrightSky" app, which supports low and medium risk victims of DA and sexual abuse. Currently it is available only on phones, making it less accessible to some employees, who might have a work laptop but not a work phone. NHS England, the DWP and police forces have made clear the need for such a service, and the NHS and DWP have expressed a desire to install it on all their computers. The funding would also enable the training of such organisations in the app. While we do not currently fund TVP (although we are in the process of making a grant agreement with them for a separate purpose from the original £2 million funding pot) this is a unique, tried and tested service with national reach which would support key parts of the public sector, hence a direct grant can be justified. We recommend that you agree to make a £80,000 direct award to Thames Valley Partnership.

Next steps

16. **If you agree with these recommendations we will inform successful bidders in confidence, enabling us to work with them to complete grant agreements and thereby make initial payments by 30th June (if they follow our deadlines).** We would announce the successful bidders and the reopening of the fund as soon as a grid slot was available, at which point we would provide feedback to the unsuccessful bidders and proactively promote the fund in the way set out above.

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Financial Implications

17. **The options described within this submission are all affordable from within the budgets allocated to the department and will be paid from the Public Protection Unit budget.**

Analysis and Insight

18. **HO Analysis and Insight have reviewed this submission and are content that it does not involve analytical issues.**

Legal considerations

19. **HOLA and GLD commercial lawyers have reviewed this submission and are content with its content.**

Media handling advice and correspondence lines

20. **The awarding of £75m for victims of domestic abuse, modern slavery and CSEA was welcomed in the media by stakeholders and MPs when it was initially announced.** However, there is increasing criticism, including from the Shadow Home Secretary, over the delays in awarding funding to groups which need it most.
21. **There is a risk that those who were unsuccessful in their applications will be critical in the media following these recommendations.** The absence of any specific funding for male victims of domestic abuse groups may lead to increased criticism that male victims are being ignored. Equally Paladin may erroneously argue that they are not being funded due to their ongoing campaign for a domestic abuse register, which is not current Government policy. While the retendering for the remaining fund may mitigate against criticism of those who have been unsuccessful, this in turn may lead to increased criticism of the delays in distributing funding.
22. **Press Office will investigate opportunities to promote the awarding of individual funds through features and digital media, with a particular focus on highlighting support for specialist BAME charities.** If approached, we will liaise with policy officials and draft reactive lines which highlight that we are working at pace to issue funding in a responsible manner. All lines and future communications will be sent up for clearance in the usual way.

Public Sector Equality Duty

23. **You are obliged to have due regard to the need to—**
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
24. **We do consider that your duties under section 149 of the Equality Act 2010 require you to take account of additional information.** The policy equality statement previously submitted concluded that the increased funding would

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benefit those affected by DA and that, in relation to protected characteristics, the evidence indicates that younger people, victims with disabilities, transgendered people, pregnant women or mothers, victims from mixed/multiple ethnic groups (female) and women generally are more likely to be victims than those who do not share those protected characteristics. We advised that the funding would help to ensure the continued provision of support for victims and their children during Covid-19 and that it represents a proportionate means of achieving these policy aims.

25. The successful bids include awards to:

- Refuge and Surviving Economic Abuse, which support female victims of DA.
- Kids Out, which is targeted at children affected by DA.
- Muslim Women's Network UK, Karma Nirvana and the Vavengers which, although not formally targeted at BAME victims, will have very high proportions of BAME people in their client groups.

26. We did not receive bids from organisations targeted at the other protected characteristics set out above, so we were not able to make awards to such groups. However, we made awards to Galop (LGBT+ victims) and Sign Health (deaf victims) from the original £2 million pot. Other organisations will have a further chance to bid when we reopen the fund and, as we fund some of them, we will be able to proactively promote the fund to them, as above. While not a disproportionately affected group, organisations representing male victims failed the assessment, but would now have a further chance to bid. Nottingham Counselling Service's bid, which failed the pre-assessment, was for a project to help BAME victims, but they too will be able to bid again.

27. We have updated the Policy Equality Statement in the light of this – please see Annex A.

Accounting Officer responsibilities

28. There are no Accounting Officer issues. The Domestic Abuse Charities Fund satisfies the Managing Public Money tests against regularity, propriety, value for money and feasibility. The bids have been through a rigorous appraisal process with a proportion failing on the grounds outlined in the body of the submission. The successful bids are expected to deliver against Home Office objectives.

Parliamentary considerations

29. The Shadow Home Secretary has written to you (Home Secretary) with concerns that too little of the £76 million made available for vulnerable people has been spent to date. We provided you (Home Secretary) with a draft reply, but you asked to reply once payments had been made. We will provide you with an amended draft reply in the light of your response to this submission.

Devolution/Union issues

30. Charities in England and Wales were eligible for this funding, and the department's Wales Team promoted it to its stakeholders. The most prominent (and vocal) Welsh DA charity – Welsh Women's Aid – will receive an award, although the other Welsh applicant (Safer Wales) will not.

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Copy list

Ministers, Permanent Secretaries, Special Advisers, Tricia Hayes, Dan Greaves,

NR	Shehla Husain, Tony Grimshaw,	NR
NR		
NR	NR	NR
NR		
NR		Domestic Abuse
Communications Team, Press Office Safeguarding and Extremism Team		