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The Women's Budget Group (WBG) is an independent network of leading academic researchers, policy experts and campaigners. We undertake gendered analysis of macroeconomic, fiscal and other government policies, and promote the use of gender responsive budgeting as a tool to achieve equality for women.

We thank the Corston Independent Funders' Coalition for generously funding this independent analysis. We also thank the Women's Centres involved for providing the source data for this report and for giving their time, expertise and resources to enable us to complete the work. The findings and recommendations, and any errors, are ours alone.

- Women's Budget Group

This is a UK Women's Budget Group briefing produced in co-operation with five expert specialist providers of Women's Centres in different regions of England.

Key findings summary

Women's Centres are specialist community support services for women facing multiple disadvantages, including women involved in (or at risk of involvement in) the criminal justice system. They are demonstrably the most effective specialist services available to women (as evidenced throughout this report and by, inter alia, the Corston Report, the UK Government Female Offender Strategy, and Why Women's Centres Work: An Evidence Briefing). This briefing argues that these services are at risk of closure for lack of secure funding and makes the case for investing in a sustainable funding model. We summarise the evidence of the cost of the current system and the savings that are already being realised through Women's Centres. We recommend a model of matched funding in which central and local government share the costs of delivering the objectives in the Government's Female Offender Strategy.

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- Women affected by the criminal justice system often have a range of multiple, complex gendered needs that are different from men's and require different responses.
- It is generally agreed, across government and the criminal justice system, that Women's Centres represent the most effective support as part of alternatives to custody.
- Despite recognition of the value of Women's Centres, funding for these services remains inadequate and precarious.
- Funding is often on a short-term basis leaving Women's Centres unable to plan for the future and staff at constant risk of redundancy.
- Commissioners' and funders' focus on 'innovative projects' can leave proven core services struggling to secure funding.
- Commissioners and funders are often unwilling to meet the full cost of services, including the necessary contribution to overheads and core costs.
- Women's Centres are managing multiple (up to 20) funding streams. This results in a massive duplication of management costs and is highly inefficient.
- The creation of a competitive market through the procurement process attracts large generic service providers who lack specialist knowledge. Women's Centres are often unable to compete for a range of reasons, including lack of resources to enter bureaucratic tendering processes and because their specialist skills are inadequately recognised in tender criteria.

- When large generic providers fail, Women's Centres who have been subcontracted to deliver services on their behalf are left bearing the cost.
- There is no central strategic overview of provision, meaning that many areas of the country are not covered by services.
- Charitable trusts and other voluntary funders are making up for the shortfall in statutory funding. One funder commented 'we are not in a position to provide long-term delivery of public services as philanthropic funders. At the moment we are providing a safety net to try and keep vital centres open – which is masking the failure of the state to secure essential services. That can't go on'.
- We recommend that a significant amount of core funding be provided centrally and matched funding granted from a local consortium of commissioners. Charity funds should only be sourced for extra services above the core requirement.
- We recommend that the Government provide mandatory commissioning guidance to local commissioners (police and crime commissioners, local health commissioners, and local authorities) to ensure that a network of appropriate services is available nationwide.

Introduction

This report is the result of collaborative working between five expert women's organisations and the Women's Budget Group.¹ It highlights the benefits of a 'Women's Centre model' and explores evidence of the costs and benefits of this model. The report draws on evidence from the range of cost structures currently in use to outline the challenges of current funding arrangements and the risks of services becoming unsustainable. Finally, we show how a new approach to commissioning of these important services could be developed, leading to a more sustainable model of provision in the future. This has the potential to reduce the costs incurred by the state across a broad range of public services and to ensure that women achieve their full potential, creating positive change for children, families and communities.

This report was about to be finalised prior to the Coronavirus pandemic, and then put on hold as WBG and the Women's Centres involved adjusted to remote working.

Women's centres continued front line delivery during the lock down by adapting their face to face one-to-one and group support to alternative forms of remote support.

The pandemic created new challenges for the centres, including loss of income, increased workload and the added pressure of applying for emergency funds. Not all the women supported by Centres had the means or knowhow to connect on-line and some found video conferencing a challenge. It is more difficult to provide safe space for women when controlling partners or children are present. Remote working has also made it harder to be part of multi-agency support, for example around child protection.

Despite these pressures the centres have been able to adapt quickly. The creation of the dedicated women's helplines enabled centres to continue to support existing and new service users through the challenges of the pandemic and there was a fast transition to online and telephone support, including through purchasing IT equipment for women.

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¹ The Women's Budget Group (WBG) is an independent network of leading academic researchers, policy experts and campaigners. We undertake gendered analysis of macroeconomic, fiscal and other government policies, and promote the use of gender responsive budgeting as a tool to achieve equality for women.

Women's Centres have been adapting continually to meet women's increasing needs, particularly linked to the impact lockdown has had on mental health and domestic abuse.

The financial data in this report provides a 'snapshot' of the position of centres for the year 2018-2019 and the overall financial position has now worsened considerably, particularly in the wake of the Coronavirus.

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Context

For many Women's Centres a key cohort is women caught up in the criminal justice system. It has long been recognised that women affected by the criminal justice system often have a range of multiple, complex gendered needs that are different from men's and require different responses.² The importance of gender-specific support, community sentences and alternatives to custody which appropriately address women's needs has been accepted by government. The Female Offender Strategy ³ aims to reduce the use of custody and ensure that courts can have confidence in effective community sentences and support services which work for women.

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² See Baroness Corston's seminal report, The Corston Report, 2007, Home Office https://webarchive.nationalarchives.gov.uk/20180207155341/http://www.justice.gov.uk/publications/docs/corston-report-march-2007.pdf

³ Ministry of Justice (2018) Female Offender Strategy https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719819/female-offenderstrategy.pdf

The Government's strategy recognises the role played by Women's Centres in meeting women's needs and explicitly commits to adopt the model more widely, repeatedly acknowledging the savings that investment in Women's Centres yield over the costs incurred directly by the criminal justice and prison system. Additional costs are also incurred in further spending on health, mental health, social security, housing and children's services. However, there has been insufficient investment in services to implement the strategy. This was most recently evidenced in the United Nations Convention on the Elimination of Discrimination against Women (CEDAW) Committee recommendation that the UK Government "Allocate sufficient resources to effectively implement the Female Offender Strategy",4 in response to extensive non-governmental organisation (NGO) evidence about the poor levels of funding for women's community services.

Issues linked to female offending cost the Government approximately £1.7bn, including police costs of around £1 billion in 2015/16. It costs £52,121 to keep a woman in prison for a year. ⁵ This does not include indirect costs such as children going into care, lost housing and lost economic output.

In 2011 Revolving Doors estimated over 13,000 women fall into the core target client group in England, meaning that around £50 million could pay for a network of Centres to meet their needs. A more recent assessment in 2018, found that the full cost of providing holistic, women-centred services to all women subject to criminal justice supervision is up to £70.7m per annum. It is generally agreed, across government and the criminal justice system, that Women's Centres represent the most effective support as part of alternatives to custody.

 $^{4 \}quad para 58 \ a) \ CEDAW / C/GBR/CO/8 \ https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW/C/GBR/CO/8\&Lang=Enroller / Color /$

⁵ Costs per place and costs per prisoner 2018-19 in the Prison Performance Statistics 2018 to 2019 - Table 2: Supplementary Information https://www.gov.uk/government/statistics/prison-performance-statistics-2018-to-2019

 $^{6 \}quad \text{Counting the Cost, Revolving Doors, 2011 http://www.revolving-doors.org.uk/file/1793/download?token=_uhAj6qrrr} \\$

⁷ Clinks and the Prison Reform Trust in 2018 https://www.clinks.org/community/blog-posts/ensuring-distinct-approach-ministry-justice-launch-their-female-offender

The Women's Centre Model

In the context of this report, we follow the definition of Women's Centres as independent specialist community support services for women facing multiple disadvantages including women involved in (or at risk of involvement in) the criminal justice system. They serve women only, in recognition of the well-evidenced need for gender-specific interventions. Centres provide holistic, woman-centred, trauma-informed services in safe, women-only spaces. Many provide access to specialist advocacy, advice and support on housing, substance misuse, mental and physical health, employment, debt, domestic abuse and family and parenting issues. This can be through in-house specialist staff and partnerships with other agencies.

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The case for investing in Women's Centre services has been summarised in successive reports, and most recently and comprehensively in **Why Women's Centres Work: An Evidence Briefing**. This independent briefing sets out:

- Why Women's Centres are needed, and the benefits they offer;
- Evidence of their impact, including direct testimonies from women supported from Women's Centres.

The report cites:

- demonstrable improvements in relationships, work, housing, neighbourhood, money, physical health as well as substantial improvements in mental health (80% of women)
- almost all the women reported a significant improvement in their life as a whole (an average 66% improvement from when they first engaged)
- Most significantly, re-offending was cut to less than 5% (the national average being 23.4%¹⁰) Women who offend are a small demographic but are disproportionately expensive to the public purse because they are a complex, vulnerable and multiply-disadvantaged group. They are also more likely than men who offend to have caring responsibilities, and the benefits of support given to them also affect their children, who might otherwise be in care, suffer disrupted home life and education, and so on.

Why Women's Centres Work: An Evidence Briefing makes clear how Women's Centres play a key role in meeting the needs of women in their communities. It provides the definitive business case for investing in this effective service model.

⁸ For example, Ending the inertia: a plan to transform outcomes for women offenders; Justice Data Lab Re-Offending Analysis: Women's Centres throughout England https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/427388/womens-centres-report.pdf

⁹ Tavin Institute (2019) Why Women's Centres Work report https://www.tavinstitute.org/wp-content/uploads/2019/05/Women-and-Girls-Briefing-Report-Final-_web.pdf

¹⁰ Statistics on Women and the Criminal Justice System 2017

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/759770/women-criminal-justice-system-2017.pdf

Costs and benefits of the model

"Women's centres are often central to Whole System Approaches...analysis found a reduction in the one year proven reoffending rate of between 1 and 9 percentage points for female offenders who received support provided by 32 Women's Centres throughout England."

The Government's Female Offender Strategy

Evidence from the Government shows that Women's Centres offer considerable benefits in reducing the costs of reoffending and repeat victimisation. However, the benefits delivered by the Women's Centre model are not even close to being realised as a result of inadequate funding.

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We have sought to address the crucial gap between the commitment to services and the allocation of resources to secure delivery, by:

- examining multiple independent evaluations of a range of service provision in terms of costs and impact;
- examining the current funding arrangements for Women's Centres and the impact that this has on services;
- recommending practical steps to achieve a sustainable funding model

Our analysis of the complexity and precarity of current funding concludes that it is unsustainable and wholly inadequate and demands a commitment from government and local agencies to long term investment.

The overarching costs

The Government's Female Offender Strategy says:

'female offenders cost the Government approximately £1.7 billion in 2015/16, including estimated police costs of around £1 billion. This excludes wider social costs, such as the cost of intergenerational offending.'

In its Strategy, the Government committed to:

'Invest £5 million Government funding over two years in community provision for women...We recognise that the availability and sustainability of these services, such as Women's Centres, is essential for ensuring that we can deliver the vision we have outlined. An additional £1.5m will be invested to support the development of community-based provision for female offenders.'

There is a colossal gap between the overall costs of current provision in excess of £1.7 billion, and the one-off investment in diversionary services over two years of £6.5 million (i.e. £3.25 million a year). This disparity continues despite the Government's overt commitment to the Women's Centre model and acknowledgment of its effectiveness in preventing recidivism and reducing the call on other services. This fifteen-month bridging fund has not met the need for sustainable funding for these services, without which the Female Offender Strategy cannot be delivered, and considerable potential savings in public spending will be lost.

The potential for savings

One recent independent evaluation¹¹ of the Women's Centre model shows one centre making a saving of £1.8 million over a 5-year period.¹² The return on investment is calculated as 4.68, which means that £4.68 is saved for every £1 invested in the project. The payback period for this scenario is one year.

The long-term savings yield a net saving of £900K with a cost benefit ratio of 2.84:1. So £2.84 is saved for every £1 spent. The savings here are achieved

through the sustained reduction in demand at a scale that allows some of the fixed costs to be cut (e.g. closing a prison wing).

Greater savings are potentially possible if services were provided to *all* women who could benefit.

These figures make the economic case for sustainable funding of a national network of Women's Centres delivering holistic, womencentred services, indisputable. The exact service mix delivering these savings will vary according to local

¹¹ Women Matta Cost Benefit Analysis, Katharine Abbott, GMCA, 2017

¹² This is the Net Present Budget impact, and assumes that all benefits are cashable - the 'gross fiscal benefits' scenario

need but will typically address the major drivers of women's offending: mental health, housing, debt, employment, substance abuse, and domestic and sexual violence and abuse. These will be services for women, in recognition of the effectiveness of gendered approaches¹³ and the lifetime of male abuse most of these women have experienced.

What funding is needed?

In 2012, the Ministry of Justice estimated that a place at a Women's Centre costs £1,360. Unfortunately, the complexity of funding and provision of different levels and types of service provided by projects makes it difficult to determine the average cost of a place at a women's centre, when the service provision ranges vastly between early intervention screening tools, to intensive one-to-one support.

Further issues arise because wages have had to be kept relatively low over the last decade, with many centres making extensive use of volunteers and the good will of leaders and other staff often carrying out multiple roles (e.g. fundraisers, bid writers, human resources management). In some cases, Centres have 'in kind' support in terms of 'peppercorn' (i.e. token or nominal) rent or seconded staff from partner agencies such as local authorities. This may account for the Ministry of Justice estimation in 2012 of a cost of £1,360 for services to each woman. Such figures are extremely misleading as averages cannot recognise the wide range of costs of delivering these services.

From our analysis of centre costs, we found a range of examples that demonstrate the true costs of delivering effective women's centre services to be significantly higher than previously estimated. The cost of delivering these services needs to include the true core costs of running the centres, including actuals for rent, management and administrative support, training and IT. In many cases, Women's Centres are funding these core costs from independent funders so that they become hidden costs when submitting funding proposals for additional workers or projects.

These are some examples of costs:

- Intensive support for women who regularly present at different services with highly complex needs costs £4125 per woman
- Specialist support for women to overcome multiple barriers to gain employment costs £3022 per woman
- Specialist Mental Health 'Through the Gate' support for women prior to release and in the early months in the community - £2635 per woman
- Intensive support for 150 women with multiple needs involving a team of 8 specialist professionals costs £2435 per woman
- Specialist intensive advocacy for women with complex needs and experience of multiple trauma - £2442 per woman
- High intensity support for women with multiple and complex needs - £2373 per woman
- A specialist counselling service based in a women's centre - £1945 per woman
- Specialist support work for women diverted from the criminal justice system - £1223 per woman

The costs and funding positions of Women's Centres in this report all relate to services outside London. Centres in London and the larger cities have to pay a premium in the form of higher rents, salaries, and other costs.

Our analysis of services outside London shows that most of the higher costs are positively correlated to the provision of intensive support achieved through higher staffing levels with smaller caseloads. It is this highly skilled, holistic support that is also the most impactful element of the Women's Centre service both for the woman and the wider community. It is particularly important when supporting women at the higher levels of need relating to mental health, homelessness and domestic and sexual abuse, and those with children, including those in the care system. Intensive services also help reduce the number of women stuck in the re-offending cycle, and their dependence on state services, through directly addressing the root causes of their offending. The benefits of this approach are felt outside of the criminal justice system, producing cost savings in other public services such as health and social care.

Equally, it is important to invest in less intensive and standard level services which offer early intervention and prevention, helping to address women's needs at an early stage, preventing them from requiring higher intensity services. The higher cost of intensive interventions is the price paid when early opportunities for preventative diversion and support are missed. For women with more complex needs, referral to a specialist Women's Centre is frequently the first time that they have received a holistic service addressing all their needs in one place. This is in contrast to the typical experience of being passed from agency to agency to address their combination of complex mental health needs, substance abuse problems, legacies of sexual and domestic abuse, involvement in prostitution/ trafficking, housing, childcare, training and employment needs.

Time and again independent impact evaluations and cost benefit analyses have demonstrated the added value of Women's Centres in terms of savings to local services and the preventive effect of giving specialist, wrap-around care to women in crisis.

The stark contrast between the costs of incarceration (£52,121 per prison place) and the costs of community-based Women's Centres alone make a compelling argument for investment in these services.

Current funding arrangements

Many Women's Centres have exhausted the funding options that have kept them afloat in recent years, including, through the disruption of Transforming Rehabilitation and can no longer maintain the 'hand to mouth' existence of managing multiple small grants, with persistent gaps in their core funding. Government departments, Police and Crime Commissioners, local authorities, NHS commissioners and representatives of independent funders must support a cocommissioning model, embedded in the forthcoming National Concordat, with matched national funding incentivising local commitments to core local services for women.

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How are Centres currently funded? - and why it isn't working

The holistic, woman-centred integrated approach, recognised as being critical to the systems-change proposed by Baroness Corston, is challenging to deliver within current commissioning approaches. Nationally and locally commissioned services are mostly procured in silos linked to a narrow categorisation of needs that is unhelpful when the aim is to offer individually tailored services that are flexible and responsive to multiple needs. For example, domestic abuse services are frequently commissioned through local authority community safety commissioning and, whilst the funding that flows from this can be used to employ staff and deliver services aimed at supporting women experiencing domestic violence, this is only one aspect of need for many women. Support to address needs relating to mental health, alcohol or substance misuse, finance and debt, also has to be provided but funding for this work must be sought separately from other sources.

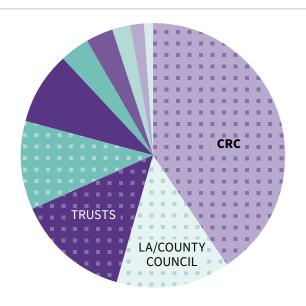
This results in specialist women's organisations managing multiple funding streams, including contracts and grants, within a wide range of different delivery time-frames and varying reporting requirements. It necessitates continual vigilance in identifying and responding to new funding opportunities and requires strenuous relationship management. There is a need for a cross-cutting approach to commissioning that recognises the importance of providing a holistic approach and delivering a range of outcomes linked to different needs. Without this, the inefficiencies of managing a multiplicity of non-aligned funding streams will continue to undermine the provision of the womencentred model that has been shown to be effective.

Sources of funding for each Women's Centre

Figure 1

Women's Centre A

COMMUNITY		
REHABILITATION COMI	PANY 40.6%	£189,161
LA/COUNTY COUNCIL	14.1%	£65,779
TRUSTS	13.7%	£63,655
MINISTRY OF JUSTICE	10.8%	£50,317
OTHER	9.0%	£41,956
COMIC RELIEF	3.6%	£16,661
NATIONAL LOTTERY	3.2%	£14,789
POLICE/PCC	2.4%	£11,167
TAMPON TAX	1.5%	£6,994
HEALTH	1.1%	£5,142



Women's Centre B

	LA/COUNTY COUNCIL	64.3%	£280,135
	MINISTRY OF JUSTICE	15.7%	£68,640
•	POLICE/PCC	10.5%	£45,545
•	HEALTH	9.2%	£40,000
	OTHER	0.3%	£1,500

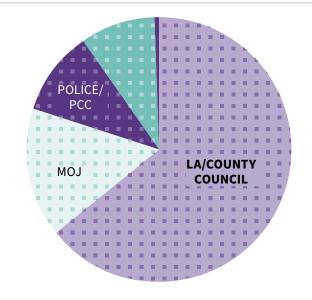


Figure 3

Women's Centre C

	COMMUNITY REHABILITATION COMPANY	39.2%	£85,000
	LA/COUNTY COUNCIL	18.3%	£39,620
•	POLICE/PCC	15.4%	£33,450
•	COMIC RELIEF	11.5%	£24,876
	NATIONAL LOTTERY	7.8%	£16,825
	TAMPON TAX	7.8%	£17,000
	OTHER	0.1%	£170

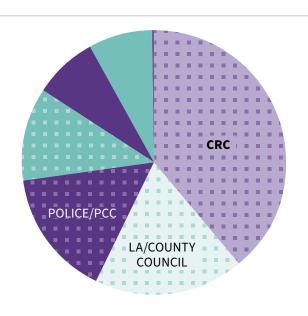
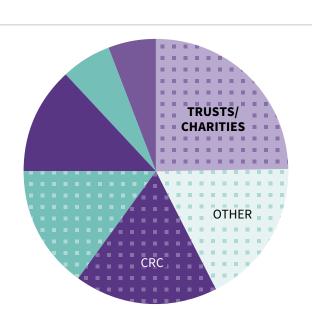


Figure 4

Women's Centre D

	TRUSTS/CHARITIES	24.90%	£228,500
	OTHER	17.70%	£162,900
•	COMMUNITY REHABILITATION COMPANY	17.50%	£160,400
•	NATIONAL LOTTERY	14.90%	£136,300
	HEALTH	13.10%	£120,000
	MINISTRY OF JUSTICE	6.20%	£57,200
	POLICE/PCC	5.70%	£52,500



Women's Centre E

	TRUSTS	59.50%	£742,864
	HEALTH	7.40%	£92,033
•	NATIONAL LOTTERY	6.80%	£85,286
•	MINISTRY OF JUSTICE	6.80%	£85,093
	COMIC RELIEF	5.50%	£68,308
	POLICE/PCC	5.20%	£65,000
	OTHER	3.50%	£43,418
	HOME OFFICE	3.00%	£37,531
	HS2	1.50%	£19,067
	TAMPON TAX	0.80%	£10,000

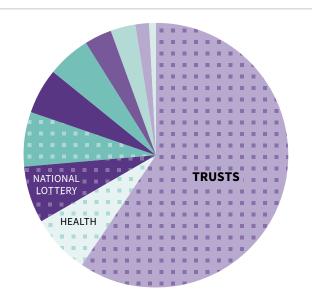


Figure 6

Women's Centre F

).1% £403	3,764
5.0% £348	3,835
.2% £323	3,607
9% £92,	586
9% £52,	190
7% £49,	300
1% £42,	000
0% £12,	833
6% £8,2	97
2% £3,2	64
2% £2,6	72
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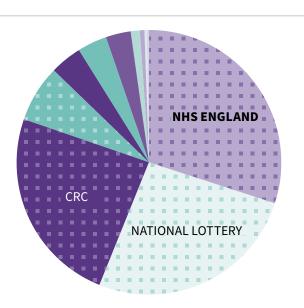


Figure 7

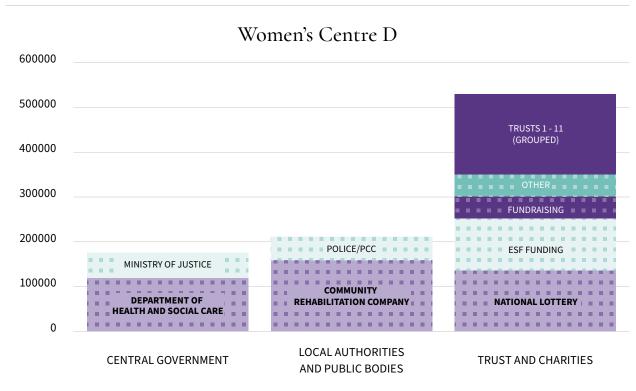


Figure 8

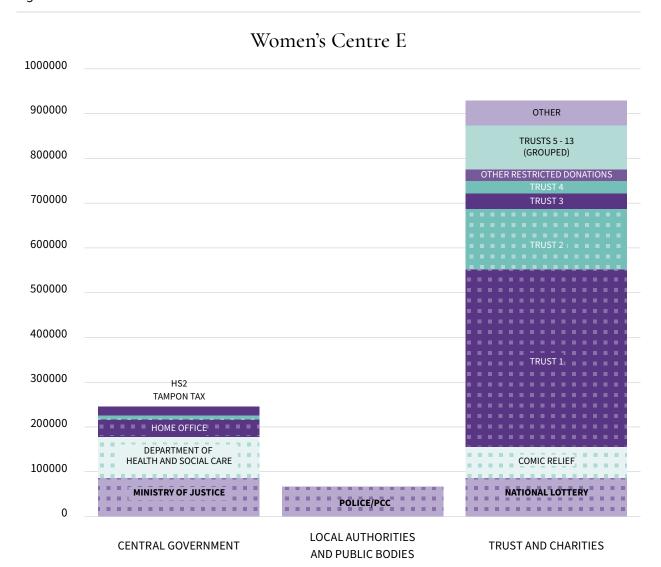
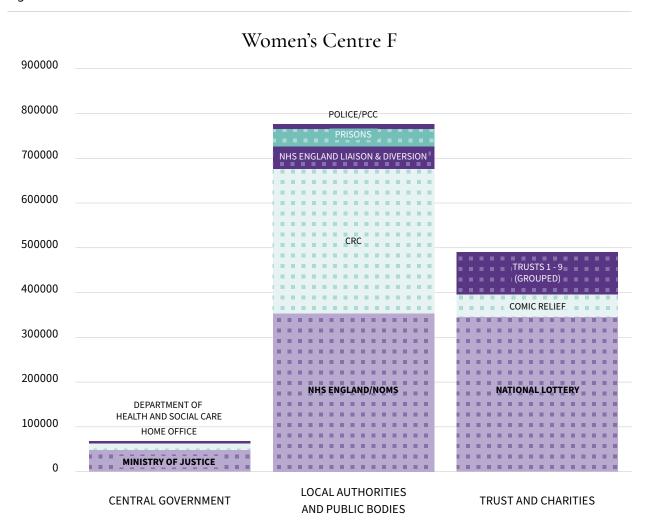


Figure 9



Our analysis of five Women's Centre providers across different regions of the UK showed that the percentage split of funding is highly variable, but the averages are as follows: Central government funding (15%), Public bodies and local authorities (50%) and trusts/charities (30%).

Central government funding varies significantly across localities. The extent to which each of the local service commissioners in state agencies including local authorities, the NHS, and the criminal justice system step up to fill the gap is highly variable. However, on average this makes up the largest proportion of income for Women's Centres. When local agencies fail to invest the money given to them by central government, or when levels of government funding are simply insufficient, the public services that Women's Centres provide are kept afloat by independent trusts and foundations or the charities themselves.

However, the funding that Women's Centres are forced to bid for to make up the gap in statutory funding from trusts and foundations can only ever provide a stopgap solution. Trusts, charities and foundations do not generally offer long term, stable and secure funding of the kind that public services need. Moreover, as Figures 7, 8 and 9 illustrate, Women's Centres often have to complete extensive bids for very small pots of money. Although centres have had some success in securing charity funding, it is clear from the evidence that we were given in face-to-face interviews with the managers who deliver the services, that they are running out of charitable funders to approach. A number of funders in the Corston Independent Funders Coalition (CIFC)14 have invested a significant amount in Women's Centres and cannot be expected to do so indefinitely. Funding needs to be sustainable and ring-fenced by central and local government in order to secure the futures of Women's Centres and the vital services they provide.

¹⁴ The Corston Independent Funders' Coalition (CIFC) is a group of grant-making trusts and foundations that came together to secure political commitment for the full implementation of the recommendations of the Corston Report 2007.

This assessment was also supported by the Corston Independent Funders Coalition, whose Chair commented: "we are not in a position to provide long-term delivery of public services as philanthropic funders. At the moment we are providing a safety net to try and keep vital centres open – which is masking the failure of the state to secure essential services. That can't go on."

The Government has accepted that Transforming Rehabilitation has failed. Contracting has failed to deliver. The picture for grant funding from government however is bleak. Grants from the public sector now make up only 5.5% of charity sector income, a decline of over 60% between 2001 and 2015. 15 Grants have largely been replaced by contracts that were not designed for the delivery of services to the most marginalised women in our community, with the most complex needs. The Grants for Good coalition has set out detailed arguments about the need to restore the balance of grant giving where it is the most efficient vehicle for securing the right high-quality services. The key need, however, with any change in funding arrangements is to avoid funding in silos and commission for holistic services that can address multiple needs.

Further evidence of the damaging impact on women's services of moving from grants to commissioning and contracts can be found in research commissioned by the Equality and Human Rights Commission as early as 2012. ¹⁶

Government has recognised and committed to address this through:

...a National Concordat on Female Offenders. This will set out how local partners and services should be working together in partnership to identify and respond to the often multiple and complex needs of women as they journey through the CJS. We aim to publish this by the end of 2018.

The Concordat has not yet been published almost 2 years after the commitment to do so was made in the Female Offender Strategy. From our analysis of the problems, it must address some critical problems that we turn to now.

Complexity and Precarity

In the typical examples shown in figures 7, 8 and 9 each Centre relies on 20 separate funding streams (or more). This means that for each stream, however small, a funding bid must be developed and a separate contract managed, entailing duplicate management costs arising from separate monitoring returns and liaison with each funder. These fixed costs are duplicated for each funder. It is a highly inefficient way to fund a public service, magnifying management overheads and transaction costs.

There is considerable reliance on the charitable sector to subsidise these public services. All the funding streams are time limited and insecure. Most are short term - they may only last for one year (or less). For example, Police and Crime Commissioners receive their funding in the form of an annual settlement, so they cannot award money beyond that period, and any money awarded must be spent within the period. The Funding contracts may start and end abruptly, with uncertainty over the initial award and the promise of subsequent renewal of funding, the latter often remaining unconfirmed well into each new financial year.

This means that staff with specialist skills must be put on notice of redundancy (a legal requirement if funding remains unconfirmed and it is foreseeable that they might lose their jobs). This intensifies staff churn and the loss of skills, jeopardising service quality and often service delivery; it also impacts on the trust of other agencies to refer women to Centres. Funding streams end randomly across the financial year, leaving service users and staff in limbo, impacting on staff retention and forcing managers to work constantly year-round to plug the gaps as they arise.

It is indeed like painting the Forth Bridge - a neverending task. Much funding is *ringfenced* for specific projects. It is difficult to secure funding for essential core services, and overheads like governance, and management costs. There is evidence that contracts often fail to offer full cost recovery;¹⁸ the majority (64%) of organisations are subsidising contracts with funding from other sources (as illustrated by the charts, significant subsidy comes from a variety of charitable funders).

¹⁵ Directory of Social Change https://www.dsc.org.uk/grantsforgood/

¹⁶ Equality and Human Rights Commission, Research Report 86, (2012)The impact of changes in commissioning and funding on women-only services https://www.equalityhumanrights.com/sites/default/files/research-report-86-the-impact-of-changes-in-commissioning-and-funding-on-women-only-services.pdf

¹⁷ Policing for the Future, report of the Home Affairs Committee, October 2018, para 156: '...Stephen Mold, PCC for Northamptonshire, said that the "imposition of one year funding settlements [...] hampers effective long term financial planning", potentially deterring forces and PCCs from making long-term investments...Dame Vera Baird also called for three year funding packages to allow for effective medium-term planning.' https://publications.parliament.uk/pa/cm201719/cmselect/cmhaff/515/51510.htm

¹⁸ The state of the sector 2018, Clinks, published 2019 https://www.clinks.org/sites/default/files/2019-05/clinks_sots-2018_recommendations_FINAL.pdf

Core costs

Core costs make up a significant amount of spending. Our analysis of five Women's Centres showed that these ranged from £115,000 to £180,000, depending on the size of the centre and services provided. Whilst most commissioners would rather fund a new project than new laptops, Women's Centres still have core costs – they need to pay rent, train staff, and have a core team for finance, fundraising, administration, human resources, management or other leadership roles. As a result of a lack of unrestricted funding, Women's Centres consistently struggle to obtain funding for core costs.

Commissioners often have a preference for "innovation", meaning that it is difficult to get funding for what works, and services that are well established have to be curtailed in favour of novel projects that are untested and unproven. In some cases, Women's Centres will be desperately trying to retain proven services and effective staff, whilst completing funding applications for "innovation" that might prop up what they know works (and prevent redundancies).

Procurement Impact

The funding model is skewed rather than supported by the procurement process, which is intended to encourage and stimulate a competitive market and drive innovation, but in fact destabilises and diverts internal resources away from the delivery of effective basic services. We might imagine how this approach would work if applied to other public services: for example, hospitals. It would mean diverting a significant proportion of their resources to the time consuming process of responding, often at short notice, and in quick succession, to invitations to bid for a multitude of very small streams of funding, and designing these bids and their services around the terms of each funding competition, which often reflect short term political expediency, and are detached from clinical need. It would leave patients more likely to experience experimentation in services, rather than what has been demonstrated by years of research to work. The pressure to show results from this emphasis on innovation means that projects that cannot show

impact over timescales as short as a year are much less likely to be funded, incentivising a shortterm approach.

Competition

The creation of a competitive market attracts large generic service providers who lack specialist knowledge but are better capitalised to deliver economies of scale. Poorly constructed tender criteria can mean that the lowest bids win, despite best value rules intended to balance quality with costs. Competitions for funding are often announced at short notice, effectively excluding community-based women's organisations that cannot respond quickly, and giving a clear advantage to larger, generic organisations that can afford to maintain a specialist team to manage their bids for work. In the vast majority of cases, Women's Centre providers have no dedicated fundraising support, so applications are produced by the CEO or services manager 'on top of the day job'.

Market Failure

Small, community-based, non-profit services like Women's Centres are exposed when the market fails. When Working Links went into administration its contract to deliver three Community Rehabilitation Companies (CRCs) fell, highlighting two key problems:

- Where frontline services are subcontracted by a private sector contractor who subsequently goes bust, there is no legal liability on government to make good their losses.¹⁹
- Secondly, they have to bear the interrupted cash flow. The collapse occurred in February 2019 and the Minister's direction to make a payment was not issued until May.

These point to a systemic failure of the tender process to identify and weed out weak bids.
The Public Administration Parliamentary Select Committee noted, in the context of a long list of government contractors in difficulty:

¹⁹ In authorising compensation, the Secretary of State wrote "I am absolutely clear that this is a unique response to a unique and specific set of circumstances. There should be no expectation that I would agree to replicate this approach in future."
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/800529/sos-letter-to-richard-heaton-working-links.PDF

'Some of the Government's contractors developed unsustainable business models over recent years, underbidding for contracts...' ²⁰

(our emphasis) and went on to assert:

'Government is in for the long term and cannot take such risks with public money or with the security of public services.' ²¹

There are major concerns with the new commissioning arrangement for the new renationalised probation service. In particular, the current approach lacks clarity on how specialist women's services will be commissioned holistically, particularly given the complexity of the current funding picture. There is a high risk that current proposals will create a worse situation for Women's Centres because the proposed approach favours large generic providers (charitable and private) and does not account for the needs of smaller specialist charities.

Referrals for unfunded work

We were given evidence that Centres routinely receive referrals from statutory agencies for which no funding is provided. Adult and children's social care services and the police were highlighted in this regard. This seems to be based on a general expectation that Women's Centres are fully funded by the justice agencies and therefore no funding is required from the other statutory agencies that refer on. A co-commissioning approach to funding by local commissioners would avoid this.

Commissioning that is compliant with the law

Central and local government have a legal obligation under the Public Sector Equality Duty²² as well as a clear policy commitment to ensure that services are gender-responsive and take into account the specific needs of women as well as men. In order to meet these obligations, funding to ensure a strategic approach to such a numerically small demographic is essential.

Services specifically designed to meet women's needs are sometimes excluded from tendering competitions by local commissioners in the mistaken belief that equality law requires that they provide only one-size-fits-all public services. In fact, the reverse is true; inequality on the grounds of sex is recognised in law and public authorities have a positive duty to ensure that they address sex inequality directly under the Public Sector Equality Duty. This is set out in section 149(1) of the Equality Act 2010, and requires those commissioning public services to have due regard to the need to:

- eliminate discrimination;
- advance equality of opportunity, and;
- foster good relations between different people when carrying out their activities.

Para 26-28 of schedule 3 of the Equality Act 2010 specifically identifies the circumstances where single sex services will be required.²³ The Offender Rehabilitation Act 2014, section 10, requires the Secretary of State for Justice to ensure contracts with providers comply with the public sector equality duty and identify anything in the arrangements that is intended to meet the needs of female offenders.

²⁰ Para 86, After Carillion: Public sector outsourcing and contracting, Public Administration Committee, July 2018, https://publications.parliament.uk/pa/cm201719/cmselect/cmpubadm/748/74808.htm

²¹ ibi

²² https://www.legislation.gov.uk/ukpga/2010/15/part/11/chapter/1

²³ http://www.legislation.gov.uk/ukpga/2010/15/schedule/3

Return on investment - who benefits?

The benefits of supporting Women's Centres go much wider than the savings to the Criminal justice agencies. Women who are involved in, or at risk of being involved in, the Criminal Justice System are disproportionately also women who have experienced violence and mental health issues. The report Hidden Hurt²⁴ has collated outcomes for women who have experienced extensive abuse. 30% have attempted suicide, over half have a common mental health disorder, while a fifth have been homeless. The report also notes that:

"women with extensive experience of physical and sexual violence are far more likely to experience disadvantage in many other areas of their lives, including disability, ill health and substance dependence; poverty, housing and debt; childhood adversity and discrimination... In addition, they are also more likely to experience indicators of chronic disadvantage spanning ill health, disability and poverty."

Rising rates of self-harm among women in prison are a significant cost to the NHS. The Prison Reform Trust discusses how the latest Safety in custody statistics²⁵ highlighted the number of hospital admissions "The proportion of self-harm incidents that required hospital attendance in the women's estate was 2.3%, an increase of 32% to 253 incidents in the last 12 months."

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²⁴ Hidden Hurt, Agenda, 2016 https://weareagenda.org/wp-content/uploads/2015/11/Hidden-Hurt-full-report1.pdf

²⁵ Prison Reform Trust web site http://www.prisonreformtrust.org.uk/WhatWeDo/Projectsresearch/Women/News/vw/1/ItemID/769

A further benefit to consider is that any investment in Women's Centres strengthens services to women who are victims of crime. There is considerable evidence of the links between victimisation and offending, particularly domestic and sexual abuse, and exploitation.

The following breakdown of return on investment to local and national partners is based on the comprehensive cost benefit analysis in Manchester. This has been selected as an illustration of the possible spread of returns; there are other cost benefit analyses available, all demonstrating significant returns. Notably these go beyond the criminal justice system.

Figure 10

Health

The local Health Partners financial return on investment is 47.66 indicating that for every £1 spent on the centre £47.66 is saved. 22% of the benefits fall to Health.

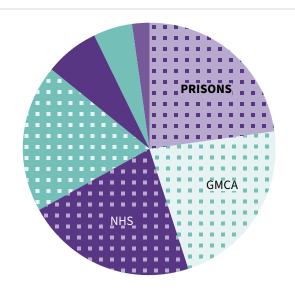
Local Authority

The figure for the Local Authority (GMCA) financial return on investment is 3.81 indicating that for every £1 spent on the centre £3.81 is saved. 22% of the benefits fall to the Local Authority.

The full share of benefits is shown in figure 10.

Fiscal Benefits

	PRISONS	23.00%
	GMCA	22.00%
•	NHS	22.00%
•	POLICE	19.00%
	COURTS/LEGAL AID	7.00%
	OTHER CJS	5.00%
	COMMUNITY REHABILITATION COMPANY	2.00%



²⁶ Greater Manchester Whole System Approach for Female Offenders Cost Benefit Analysis Report by Katharine Abbott, J&R Evidence Lead, GMCA, October 2017

²⁷ For example, The development and impact of community services for women offenders: an evaluation, 2013, Institute for Criminal Policy Research, https://www.mappingthemaze.org.uk/wp/wp-content/uploads/2017/08/Radcliffe-and-Hunter-Evaluation-of-community-services-for-women-offe.pdf; and Independent cost benefit analysis of Brighton Women's Centre commissioned by DCLG, 2018 (unpublished)

Creating a sustainable future

Other work by the Women's Budget Group²⁸ has shown how austerity and cuts to local authority budgets have negatively impacted women. The research demonstrates that women have shouldered the majority of the recent government changes to tax and benefits, calculating that 86% of the cuts made under austerity affect women. Further it is the poorest women, those taking caring roles or in low paid work, and those from Black, Asian and minoritised communities who fair worst of all women.

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²⁸ WBG (2016) The impact on women of the 2016 Budget: Women paying for the Chancellor's tax cuts. https://wbg.org.uk/wp-content/uploads/2016/03/WBG_2016Budget_FINAL_Apr16.pdf

Alongside the direct impact on welfare payments and tax credits available to them, women have seen the decimation of services in their local areas. The closure of spaces which have traditionally offered support and advice in relation to financial difficulty and debt, domestic abuse and safety, alcohol addiction or mental health, means that women reported coping with these issues in isolation both from other women and from the direct support of professionals. In this context, the Women's Centres are a beacon of support to the women who use them.

In this climate, we must establish improved arrangements for the 'women's sector', by which we mean women's organisations within the wider voluntary community and social enterprise sector (VCSE). Women's services are, however, increasingly provided under contract or through grant funding, by generic (i.e. non-women-specialist) organisations in either the VCSE or public and private sector. This represents a threat to the provision of a genuinely women-centred, gender-responsive approach.

As the women's sector has campaigned for funding from sources such as the Tampon Tax, women's services have been identified as a market by large generic charities, social enterprises and companies. There are numerous examples of such non-specialist organisations 'winning' competitive processes on price. The result is often loss of quality, reduced services, worse terms and conditions for staff and more instability for services. Such organisations do not draw support from volunteers and independent funders, so the result is often less resource overall. This has certainly been the case with Transforming Rehabilitation and is one reason for its failure.

Generic organisations have increasingly been receiving funding for women's services. For example, the recent allocation of funds from the Tampon Tax, where only one of the ten available awards was made to a women's sector organisation.²⁹ This is despite women service-users/ survivors of gender-based violence repeatedly saying they find services delivered by women's organisations 'led by and for' women to be more effective in meeting their needs.³⁰

Women's sector organisations led 'by and for' women are usually built by women with experience and deep knowledge of the dynamics of abuse and trauma, are embedded in local communities, and are exactly what women need to be safe and to rebuild their lives. These organisations offer innovative, women-centred approaches to women's long-term support needs. Examples include Brighton Women's Centre, Anawim, Together Women, Nottingham Women's Centre, the Beth Centre run by Women in Prison in Lambeth, Woking Women's Support Centre, North Wales Women's Centre, Nelson Trust and a range of agencies in London and in the Greater Manchester Women's Support Alliance (GMWSA).

Generic organisations may replicate some of these approaches in service delivery, but with varying degrees of success.³¹ They are rarely if ever able to build the profile in the local community which leads to the levels of self-referrals the 'by and for' women's sector has (a key measure of success), and to develop innovative responses to gender based violence and the root causes of women's offending. In addition, they usually work towards the delivery of a contract, rather than building a co-ordinated community response through multiple contracts and funding sources.

Liz Hogarth has made clear the extent to which local governance arrangements are central to the development and delivery of services for women. In a paper for the Centre for Crime and Justice Studies, ³² she argues that Local Authorities should have the lead role and Health and Well-being Boards, clinical commissioning groups, Public Health Teams and Community Safety Partnerships all need to be involved, as do Police and Crime Commissioners (PCCs).

The thinking articulated by Toby Lowe and others³³ is helpful in illustrating why a different approach is required. The concept of Human Learning Systems is being used to show how commissioning that takes account of the complexity of meeting social needs can be achieved. For example, this approach is being used by public sector commissioners in Plymouth where they have commissioned an £80m 10-year system of support for vulnerable adults with no KPIs or output/outcome targets. Here, they have built

 $^{29 \}quad https://www.gov.uk/government/news/charities-across-the-uk-supporting-vulnerable-women-benefit-in-latest-round-of-funding-from-tampon-tax-funding-from-tax-funding$

 $^{30 \}quad https://www.wrc.org.uk/wp-content/uploads/2018/09/WRC-Report-2018-FULL-24th-May-2018-1.pdf$

 $^{31 \}quad https://www.homeless.org.uk/sites/default/files/site-attachments/Women\%27s\%20research_March\%2019_1.pdf$

Trapped in the Justice Loop: Past, present and future of the woman-centred services at the heart of the systems-change called for in the Corston Report, Liz Hogarth, Centre for Crime and Justice Studies, 2017

³³ Embracing complexity to do what's best for people, Toby Lowe and Dawn Glimmer, 2019, https://collaboratecic.com/embracing-complexity-to-do-whats-best-for-people-993031b72d5b

an effective learning system of organisations, and are holding them accountable for working together and learning. Such an enlightened approach to the funding of services for women with multiple needs could create a significant change in the capacity of Women's Centres to provide stable, long-term support that is truly holistic.

Solutions and recommendations

Our analysis shows that the lack of a single commissioning stream locally or nationally for Women's Centres means that they need to map and engage with multiple commissioners. This is inefficient. There is no central strategic overview of provision, meaning that many areas of the country are not covered by services. This is ineffective and expensive and does not meet the Public Sector Equality Duty. Most importantly, there is no secure stream of funding for either the existing network or to expand the network to meet additional needs: this is a missed opportunity to make major savings to the public purse. There appears to be no attempt to calculate the level of service provision required across the country.

Women's Centres source local state funding from a combination of police, probation, local authority, and health commissioners. This means they depend on the priority that local commissioners give to an inevitably small local population of multiply disadvantaged women, often with high support needs requiring intensive services. The size and marginalisation of this group of women means that they are often ignored. The problem of devolving funding decisions completely to local level removes any strategic overview. Moreover, the fact that women's prisons are scattered around the country, holding women from different areas and often long distances from home skews the pattern of local need. Funding for local services to meet the needs of such a tiny fraction of those involved in the criminal justice system is unlikely to be provided at local level (this is amply demonstrated by the funding problems outlined in the previous section).

In some areas the local commissioners are fully engaged: for example, the Greater Manchester Women's Support Alliance (GMWSA) was established by seven local providers of women's services who are funded to deliver support services to women involved in the Criminal Justice System (CJS) across Greater Manchester.³⁴ They work with the commissioners to represent the interests of their service users, share good practice and ensure that no service operates in isolation. The Alliance has a presence in each of the ten local authority areas across Greater Manchester.

In London, the Mayor's Office of Policing and Crime (MOPAC) has in recent years taken a more strategic approach, 'top slicing' borough funding to create the London Crime Prevention Fund (LCPF)³⁵ which enables local authorities to work together to create connected hubs of women's services, including providing spaces for diversionary services for women in contact with the police.³⁶ Even in these areas, there is a struggle for providers to achieve the level of funding they require and stable commissioned services do not consistently exist.

The basis for an alternative central funding model exists in the Ministry of Justice's Victim and Witness Budget.³⁷ This provides funding for local victims' services. It includes the Rape and Sexual Abuse Support Fund which is determined and allocated to community-based sexual violence and abuse services annually, providing a small measure of stability.

In the same vein, the Ministry of Justice established the Women's Diversionary Fund (WDF) in 2008 with the Corston Independent Funders Coalition to sustain a network of community alternatives to prison. The Centre for Social Justice has recommended the creation of a new central Criminal Justice Transformation Fund for Women, funded by reallocating the £50 million capital expenditure earmarked for Community Prisons for Women, plus £15 million (the equivalent to

³⁴ https://gmwsa.org.uk/

³⁵ https://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/community-safety/crime-prevention/london-crime-prevention-fund

³⁶ https://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/governance-and-decision-making/mopac-decisions-336

³⁷ https://www.gov.uk/guidance/victim-and-witness-funding-awards

the Core Allowance of Universal Credit), plus 50 percent of the savings realised as the women's prison population falls. If this approach was taken and applied to commissioning women's services through the reform of probation commissioning there is a possibility of transformational systems change. Women in Prison's #OPENUP Campaign recommends that the £80 million that has come to the Treasury from the sale of HMP Holloway be dedicated to building a national network of sustainably-funded Women's Centres.

Similarly, the All Party Parliamentary Group (APPG) on Women in the Penal System has recommended that budgets for women's services should be ringfenced and transferred to the National Probation Service to commission locally and regionally.³⁹ The complex issues with the MoJ's Dynamic Framework for commissioning are well-known and it is clear this is not the best way to commission services for women. The APPG's recommendations need to be implemented. Commissioning by the National Probation Service under the new arrangements must be carefully guided by principles that recognise the importance of the Women's Centre model. There is a need to avoid the pitfalls of Transforming Rehabilitation which resulted in many Women's Centres being passed over in favour of larger, generic organisations with no track record of gender-specific, trauma-informed holistic service delivery.

There may be benefits in exploring how the approach to commissioning the Female Pathway for Liaison and Diversion services⁴⁰ has been developed and implemented. The application of methods of co-production – whereby service providers with delivery model expertise are engaged in service design – may offer valuable learning.

All these initiatives and recommendations are an acknowledgement that the nature of Women's Centres' work means that funding must be managed centrally in order to ensure strategic oversight and sustainable service coverage.

We recommend that a significant element of core funding should be provided centrally and matched funding be granted from a local consortium of commissioners. Charity funds should only be sourced for extra services above the core requirement.

We recommend that the Government provide mandatory commissioning guidance to local commissioners (police and crime commissioners, local health commissioners, and local authorities) to ensure that a network of appropriate services is available nationwide. The guidance must be given weight through the new Concordat agreement which should mandate that matched funding be provided by local commissioners, and with central core funding to ensure stability.

Specialist women's organisations provide the best approaches to supporting women with multiple needs, and in doing so have the potential to create significant savings in other areas of public expenditure. However, these services are at risk of closure for lack of secure funding.

³⁸ A Woman-Centred Approach: Freeing Vulnerable Women from The Revolving Door of Crime, March 2018, page 4, Centre for Social Justice, https://www.centreforsocialjustice.org.uk/core/wp-content/uploads/2018/03/A_Woman-Centred_Approach_CSJ_web.pdf

³⁹ Is this the end of Women's Centres? All Party Parliamentary Group on Women in the Penal System, 2016 https://howardleague.org/wp-content/uploads/2016/11/Is-it-the-end-of-womens-centres.pdf

⁴⁰ https://www.england.nhs.uk/commissioning/health-just/liaison-and-diversion/news/workforce/

Recommendations for a sustainable funding model

There is a need to invest in a sustainable funding model.

We recommend a model of matched funding in which central and local government share the costs of delivering the objectives in the Government's Female Offender Strategy.

To ensure that effective services for criminalised women with multiple needs can be appropriately commissioned it is essential that specialist women's organisations are clearly defined. We recommend the following set of criteria be used to identify a women's specialist provider when designing procurement processes:

- 1. States within its constitution/Memorandum and Articles of Association that the organisation's main purpose is to provide services for women, particularly those affected by prison, the criminal justice system and those facing multiple disadvantage.
- 2. Is 'led by and for' women as a group with protected characteristics under the Equality Act 2010. This will usually mean at least 80% of trustees and staff are women.
- 3. The vast majority of people benefitting from the service are women (usually 80% or more).
- Has a track record of providing women's specialist services nationally or regionally/ locally.
- 5. Where relevant, has a local connection to the area.

If a network of Women's Centres were to be funded centrally, with funding awarded against criteria designed to select organisations with a successful track record of delivering the Women's Centre model, it would achieve a number of objectives:

- nationwide coverage will be supported;
- strategic investment at national level would secure consistent local savings;
- assured quality standards for women's services overseen and monitored by central government would secure local commissioning of specialist services to meet women's gendered needs, rather than a single contract for generic support services;
- a healthy and diverse mix of service providers will be appropriately maintained as local community-based services will not be crowded out by generic national and regional service providers;
- specialist skills and gendered women's specialist service provision would be secured.

Core funding will help provide sustainability, to enable a minimum level of services matched by local commissioners according to varying local needs, year on year, removing the constant threat of cuts and closure that hangs over these services and impedes achievement of the goals of the Government's Female Offender Strategy.

In collaboration with







