



west midlands  
police and crime  
commissioner

Police and Crime Panel  
30 September 2013

## Commissioning of Support Services for Victims of Crime

### Report to the West Midlands Police and Crime Panel

Report of West Midlands Police and Crime Commissioner

#### Purpose

1. The purpose of this report is to update members of the Police and Crime Panel on the current situation regarding commissioning of support services for victims of crime.

#### Background

2. Following a Government consultation in July of last year ('Getting it right for victims and witnesses'), police and crime commissioners (PCCs) will be responsible from October 2014, for commissioning locally most of the emotional and practical support services for victims of crime that are provided by the voluntary, community and social enterprise sector. These services help victims to cope with and recover from the impacts of crime.
3. The Ministry of Justice will retain responsibility for commissioning certain specialist services and £22m of the core budget has been allocated for these national services. This is in line with the current spending on these services. Support includes services for those bereaved through homicide, rape support centres, court based witness services, human trafficking and some telephone helplines such as BRAKE.
4. The total MoJ budget for commissioning services at both the national and local level consists of £50m core victims' services budget and up to a further £50m of additional revenue to be raised from offenders through the Victims Surcharge, and increases to the value of penalty notices for disorder and motoring fixed penalty notices.

#### Referral Mechanisms

5. With the move to local commissioning of victims services, the MOJ is currently engaging with all PCCs to consider the options in commissioning approaches to ensure effective, value for

money arrangements for referrals to support services. The current model for funding victims services is run centrally, and supports a mechanism for referral by police into victims services. This includes a provision of information on the services available to victims; arrangements for assessing the type of support needed by victims where required, and onward referral to local support or other specialist support.

### **Funding formula and mechanism**

6. Local commissioning will take effect from October 2014 and funding will be issued as a grant under s56 of the Domestic Violence, Crime and Victims Act 2004. PCCs will receive the victims funding separately to the Police Main Grant. At this stage, the overall budget for local commissioning has not been confirmed, as the decision on the referral mechanism still needs to be made (as explained below), and also confirmation of the amount of funding available from the victims surcharge. The funding formula on which the allocation is based has been devised using population data. Funding has been allocated dependant upon each PCCs resident population. This raises a fundamental issue that some areas will be better off financially with this formula. An area such as Warwickshire which has a large population, but fewer victims of crime will benefit, compared to the West Midlands which has significantly more victims of crime. The Police Allocation Funding formula was considered however it is designed to fund policing and is therefore based on a number of factors, including some which are not necessarily appropriate to funding victims' services.
7. Indicative budgets by Force area will be provided in October 2013, and they will be updated in December 2014. The Office will receive confirmed budgets in April 2014 for the period of October 2014-March 2015. The levels of grant will be protected once the MoJ have provided us with a final figure and will form the basis for the 2015-16 budget. The rationale for the staged approach to the confirmed budget is that as additional revenue from offenders will take time to maximise and actual receipts will be used to revise indicative budgets over time.

### **Referral of victims to support services**

8. The Code of Practice for Victims of Crime, and the EU Directive for Victims (which takes effect in November 2015), sets out legal requirements for a range of victim entitlements which include:
  - Provision of information on and contact details of victims' services
  - Referral of victims to victims services
  - Access to free of charge service in accordance with need (inc. needs assessment). A fuller explanation is attached at Annex A.

Neither the code or the Directive prescribes how these entitlements should be delivered and therefore it is up to PCCs to decide locally what the structure will look like.

### **The current model**

9. Current national referral and onward support arrangements are delivered by Victim Support. This includes a referral mechanism by which police forces securely transfer victims' data to Victim Support to enter onto their case management system. Contact is then made with victims via telephone or letter, with information on services available wherever possible (and in the majority of cases), and needs assessments conducted as required. Many immediate needs are met during this contact.

10. Where further support is required, a referral is made either to specialist service provision or to Victim Support at area level. At area level, the support is either provided by Victim Support or where required, referred onto other local service providers.
11. Victim Support also provides a national telephone helpline for victims wishing to access support services without having to engage their local police force, if they do not want to report a crime.
12. Victim Support currently receives £38m per annum grant, of which £22m is spent on core services to victims.

### **Commissioning of a referral mechanism**

13. PCCs have been given two options from which to give their preferences:
  - Option 1: Local commissioning of arrangements to meet all the requirements, with conditions set out in PCC grant conditions and all related funding being allocated to PCCs. This also includes the option for PCCs to collaborate on the commissioning of services.
  - Option 2: National commissioning (by the Ministry of Justice) of some, or all of the arrangements, where this is considered to be the most effective approach. This will reduce the available budgets to PCCs.

### **Engagement and decision making**

14. A decision has to be made by the start of October 2013, to ensure that there is adequate time to design and develop a commissioning approach, for October 2014. At this time, advice will be proposed to Ministers based on the feedback from PCCs.
15. The possible outcomes are:
  - Unanimous agreement in favour of local commissioning which will be commissioned by PCC either individually or as consortia
  - Unanimous agreement in favour of national commissioning with the MoJ commissioning
  - No unanimous agreement in favour of local commissioning.
16. The decision on commissioning of the referral mechanism will have an influence on subsequent decisions about wider victims' commissioning and the budgets that will be available to PCCs. It is not a decision as to the content of services that victims who require ongoing or specialist support are referred to, or who provides these, nor how you choose to commission these services. At this stage, what the MoJ is asking PCCs for is a unanimous decision about **how** to refer victims to those commissioned services - through national or local commissioning of the referral mechanism.

### **The Commissioners View**

17. The Police and Crime Commissioner is committed to enhancing provision and entitlement for victims however, is of the view that the proposed arrangements are neither in the interests of

victims in the West Midlands nor represent good use of scarce public funding. The Commissioner has written to all PCCs via the APCC and to Helen Grant MP, stating that he is not supportive of local commissioning and raising the following issues:

- it would appear that one of the more recent options that is being considered would see the original proposals moving away from local commissioning to simply local administration of a national framework.
- The funding allocation could mean significant amounts of money to support victims will be transferred to areas with much lower number of victims.
- Where there is substantial integrated provision, the split of resources into victim and witness support means both an additional complexity, creating additional cost and expense and where providers already in receipt of one stream of funding will be at a significant advantage in bidding for other streams as they already have significant overheads met they would be able to adopt marginal pricing strategies, disturbing any local commissioning arrangement.
- The information about current provisioning shows few that exclusively provide services to victims within the West Midlands and that break down into PCC areas again adding to additional bureaucratic burden to the process.
- Which locality is responsible to the victim? Is it where the victim resides, where the crime is committed or where the criminal justice intervention takes place? This is compounded by the need to deal with victims dealt with British Transport Police and Action Fraud.
- In terms of the criminal justice system, there should be an expectation of a similar level of entitlement and provision throughout the courts and these reforms increase the chance of a postcode lottery.
- Any commissioning process, if forced on PCCs, will result in significant resources diverted for example, to West Midlands Office for Policing and Crime to create a commissioning bureaucracy which will divert funds from victims support provision.

18. The Commissioners preferred outcome is that commissioning for victims services continues to be provided through a centralised structure. He does not feel that PCCs are able to add value and would only add cost and complexity to the arrangements, nor does he believe it is in the interests of victims in the West Midlands to fragment commissioning of their support services and therefore he is not supportive of the proposals

19. There is a meeting of PCCs and/or their representatives taking place on the 19 September to get a view on the likely outcome of the decision making process. Cath Hannon, the Victims lead Board member and Jacky Courtney, Chief Executive of the West Midlands Office for Policing and Crime, will be putting forward Bob's view in favour of national commissioning.

### **Developmental Work**

20. Work has been taking place to look at possible structures in the West Midlands, as there will be local commissioning of services. Once the decision has been made regarding the referral mechanism, budgets will be allocated for local commissioning of services, or a local referral

mechanism and commissioning of services. This next section updates the panel on the results of the consultation on the establishment of possible structures to engage with victims and allocate future funding. The Commissioner held a Victims' Summit in January 2013, and following on from that, there was a consultation which ran for 12 weeks from March 4 until May 31.

21. The Commissioner has responsibility to gain the views of the public, with specific mention of victims of crime, in the policing area about matters concerning policing and crime. These requirements are set out in the Police Act 1996 as amended by the Police Reform and Social Responsibility Act 2011. Other statutory consultation duties of relevance are those which require public consultation on the Commissioner's police and crime plan.
22. The Commissioner held a Victims' Summit on the 11 January 2013 with a number of specific objectives which included the opportunity to:
  - speak to victims and representatives in order to ensure that adequate support services are in place for victims and their families
  - discuss the distribution of victims funding which is being transferred to the Commissioner in October 2014 and to consider how the needs of victims will be represented locally. Police and Crime Commissioners will be responsible for ensuring that the emotional and practical support services for victims of crime are met. These services help victims to cope with and recover from the impacts of crime.
  - At the event the Commissioner also set out his ambitions for community led local policing and crime boards in each of the seven local authority areas which will ensure that the views of local people are reflected in priorities set locally for policing and crime. The Boards will also be responsible for ensuring that those priorities are delivered. They will be part of the decision making process on the local allocation of funds and monitor their local police and crime plan. The boards will be made up of members of the community as well as responsible authorities although the exact composition will be a matter for local determination.
23. Roundtable discussions gave participants the opportunity to discuss and develop options for distribution of victims funding from 2014. The information gained from the Summit formed the basis of the public consultation document.

### **The Consultation**

24. The information gained from the Summit formed the basis of a public consultation document 'Victims Should Come First' which was launched on the 4 March 2013. The closing date for responses to the consultation was the 31 May 2013. In total, 119 formal responses were received. The consultation asked two questions:
  - Question 1 was about the development of a Victims Commission with a proposal that the Commission develop policies and procedures, identify local concerns and priorities and influence the final decisions on funding and allocations.
  - Question 2 gave three options for a commissioning framework and delivery structure. They included:
    - Option 1: West Midlands wide structure, led by Victims Support, working with other voluntary, community and social enterprise (VCSE) organisations
    - Option 2: West Midlands structure comprising VCSE organisations with no lead organisation

- Option 3: In house procurement by the Office for Policing and Crime

## **The outcomes of the consultation**

### 25. Question 1

61% of respondents agreed with the setting up of a Victims Commission. A consistent message was that the Commission should ensure involvement from groups that cover the diversity of victims groups and support the diversity of the population of the West Midlands.

### 26. Question 2

Option 1 was supported by 78% of the responses. Respondents felt that Victim Support were well established and experienced in keeping victims of crime as the main focus, had a good structure in place and good links to the Force. There were concerns from some voluntary sector organisations that believe Victim Support is a mainstream organisation and a direct competitor to many of the voluntary and community specialist organisations. There is a consensus that there needed to be a lead organisation to drive the project, however there is also a need to ensure that there is not a dominant group within the decision making process.

Option 2 was supported by 18% of the responses. It is felt that there is a wide range of victims groups operating across the West Midlands area, many who provide specialist support for victims and they need to be recognised for the work they do. They should also feature as part of a suite of provision which can be accessed by victims across the area.

Option 3 received 3.2% of responses. Consistent messages were around the cost involved in setting up a new structure and also that we should utilise existing structures.

27. Two alternative options were put forward as part of the consultation at 0.8%. The suggestion being that Community Safety Partnerships (CSPs) should drive priorities from a local level with funding being awarded to them so that they can commission the support for victims from the voluntary and community sector. Alternatively, that the seven CSPs form a collective and commission services regionally across West Midlands force area. The full report is available at Annex B.

## **Next Steps**

28. There are a number of questions that need to be addressed in preparing for new commissioning arrangements. They include:

- What is the demand for support services to victims and witnesses?
- What services are delivered now, where, how and what gaps can be identified in the scope and effectiveness of that provision?
- What should victims and witnesses be able to expect from the support they receive in the future?
- What are the options to bring this change about?

29. The Commissioner has approved a review of current provision and future requirements on behalf of the West Midlands and the review will be used to inform the commissioning structure.

30. The Commissioner is now doing further scoping work with Victim Support and the voluntary and community sector taking into account the results of the consultation.

## **FINANCIAL IMPLICATIONS**

31. The total budget for victims' services consists of £50 million current spend (£40 million core budget and £10 million Surcharge revenue) and up to a further £50 million of additional revenue to be raised from offenders through the Victims Surcharge and increases to the value of Penalty Notices for Disorder (PNDs) and motoring Fixed Penalty Notices (FPNs). Currently, the level of budget has not been defined, however the Ministry of Justice is allocating funding based on population data. The Commissioner will receive an indicative figure in October 2013.

## **LEGAL IMPLICATIONS**

32. The funding will be issued as a grant under s56 of the Domestic Violence, Crime and Victims Act 2004.

The Commissioner has responsibility to gain the views of the public, with specific mention of victims of crime, in the policing area about matters concerning policing and crime. These requirements are set out in the Police Act 1996 as amended by the Police Reform and Social Responsibility Act 2011. Other statutory consultation duties of relevance are those which require public consultation on the Commissioner's police and crime plan.

## **RECOMMENDATIONS**

33. The Board is asked to note the contents of the report.

## Code of Practice for Victims of Crime

1. The Code states that when a crime is being investigated by police, victims are entitled to receive from police:

- an assessment of their needs so they can access victims services if appropriate;
- their details passed to victims services where help or support is needed, within two working days of making a request or if a victim of most serious crime, a persistently targeted or vulnerable and intimidated victim, within two working days of making an allegation unless they do not want their details passed to victims services;
- contact details of victims' services so they can access support at any time.

Victims may discuss and agree with police different timings to receive the information and services to which they are entitled above, to suit their needs.

In addition, victims of most serious crime, those persistently targeted or vulnerable and intimidated, are entitled to be referred to a specialist organisation, where appropriate and available.

Close relatives of a victim who dies as a result of criminal conduct are entitled to be offered accessible advice on bereavement and information on available victims' services, by police.

### Minimum standards

Under the Code, the police must:

- assess whether victims fall into one of the three priority categories: victims of the most serious crime; persistently targeted victims, and vulnerable or intimidated victims;
- automatically refer victims in the three priority categories to appropriate victims' services within two working days of the allegation being reported, unless they do not want to be referred;
- only provide information about victims of sexual or domestic violence offences or the details of close bereaved relatives if they give their explicit consent;
- refer all other victims to victims services either within two days of a request from the victim to do so OR within two working days of the allegation being reported, unless they do not want to be referred, depending on the outcome of the current consultation on the Code on this point;
- inform all victims that they can choose to refer themselves to victims' services at a later date and provide contact details for victims' services;
- provide all victims with the "information for victims of crime" leaflet or refer the victim to a website which contains the same information as soon as possible and not later than five working days of the victim making an allegation of criminal conduct. This must include contact details for victims' services.

The police or any other service provider acting as the main point of contact in the case, should inform those victims identified in the three priority categories that pre-trial therapy is available if needed, and, if requested, will be facilitated. The relevant service provider must also refer victims in the three priority categories to specialist organisations where appropriate and available.

## **The EU Directive for Victims**

2. The EU Directive on Victims was adopted on 4 October 2012. Member states have until 16 November 2015 to implement the contents of the Directive. The articles considered relating directly to victims' services and their provision by Member States are:

Article 8 concerns the right to access victim support services.

Member States shall ensure that victims, in accordance with their needs, have access to confidential victim support services, free of charge, acting in the interests of the victims before, during and for an appropriate time after criminal proceedings. Family members shall have access to victim support services in accordance with their needs and the degree of harm suffered as a result of the criminal offence committed against the victim.

Member States shall facilitate the referral of victims, by the competent authority that received the complaint and by other relevant entities, to victim support services.

Member States shall take measures to establish free of charge and confidential specialist support services in addition to, or as an integrated part of, general victim support services, or to enable victim support organisations to call on existing specialised entities providing such specialist support. Victims, in accordance with their specific needs, shall have access to such services and family members shall have access in accordance with their specific needs and the degree of harm suffered as a result of the criminal offence committed against the victim.

Victim support services and any specialist support services may be set up as public or non governmental organisations and may be organised on a professional or voluntary basis.

Member States shall ensure that access to any victim support services is not dependent on a victim making a formal complaint with regard to a criminal offence to a competent authority.

Article 9 concerns the support from victim support services.

Victim support services, as referred to in Article 8(1), shall, as a minimum, provide:

(a) information, advice and support relevant to the rights of victims including on accessing national compensation schemes for criminal injuries, and on their role in criminal proceedings including preparation for attendance at the trial;

(b) information about or direct referral to any relevant specialist support services in place;

(c) emotional and, where available, psychological support;

(d) advice relating to financial and practical issues arising from the crime;

(e) unless otherwise provided by other public or private services, advice relating to the risk and prevention of secondary and repeat victimisation, of intimidation and of retaliation.

Member States shall encourage victim support services to pay particular attention to the specific needs of victims who have suffered considerable harm due to the severity of the crime.

Unless otherwise provided by other public or private services, specialist support services referred to in Article 8(3), shall, as a minimum, develop and provide:

(a) shelters or any other appropriate interim accommodation for victims in need of a safe place due to an imminent risk of secondary and repeat victimisation, of intimidation and of retaliation;

3. (b) targeted and integrated support for victims with specific needs, such as victims of sexual violence, victims of gender-based violence and victims of violence in close relationships, including trauma support and counselling.



## **VICTIMS SHOULD COME FIRST - CONSULTATION RESPONSE**

### **Introduction**

The Police and Crime Commissioner for the West Midlands held his first Victims Summit on the 11 January 2013, and it had a number of specific objectives which included the opportunity to:

- speak to victims and representatives in order to ensure that adequate support services are in place for victims and their families
- discuss the distribution of victims funding which is being transferred to the Commissioner in October 2014 and to consider how the needs of victims will be represented locally. Police and Crime Commissioners will be responsible for ensuring that the emotional and practical support services for victims of crime are met. These services help victims to cope with and recover from the impacts of crime.

At the event the Commissioner set out his ambitions for community led local policing and crime boards in each of the seven local authority areas to ensure that the views of local people are reflected in priorities set locally for policing and crime, and also that those priorities are delivered. They will also be part of the decision making process on the local allocation of funds and monitor their local police and crime plan. The boards will be made up of members of the community as well as responsible authorities. The exact composition will be a matter for local determination.

Roundtable discussions gave participants the opportunity to discuss and develop options for distribution of the victims funding from October 2014. The information gained from the Summit formed the basis of the public consultation document 'Victims Should Come First' which was launched on the 4 March 2013. The closing date for responses to the consultation was the 31 May 2013.

This document provides a summary of the main themes emerging in response to the consultation questions. The Strategic Policing and Crime Board report that sits alongside this response indicates the direction the Commissioner intends to take, following consideration of the views expressed. In total, we received 119 formal responses to the consultation and the appendix to this summary paper provides further details of those who responded.

### **Development of a Victims Commission**

We said:

The Commissioner will benefit immensely from external involvement from individuals, groups, organisations and communities. Ensuring that there is a wider perspective makes policing at both a strategic and local level more effective and more responsive to community needs.

Independent advice is especially valuable in relation to:

- developing policies and procedures
- ensuring that the priorities for the local authorities areas, and also the West Midlands are appropriate by working with communities and partners to identify local concerns and solve problems



The role of the Commission should include consultation on the needs of victims, research and response options, effective, evidence based practice, review and monitoring of provision, encourage partnership working where crossovers exist, and share gaps in service with existing providers to enable them to consider widening their scope of activity. It should also act as an expert stakeholder forum gathering information about victim's needs, collating service user input and providing an updated audit of current provision and the vulnerabilities of that provision. It could lead on strengthening the links between the police, CJS and the range of support agencies accessed by victims.

Not all victims of crime see themselves as such and the branding of support services needs to ensure that it does not become a barrier to engagement or create a stigma that prevents people seeking help.

### **Commissioning Framework and Delivery Options**

We said:

Now we would like you to choose your preferred option for delivery of services and the reasons why you have chosen that option.

Engaging with community organisations in the design, commissioning, delivery and evaluation of services, whether through a Victims Commission as outlined above or otherwise, is essential to ensuring effective and efficient services that respond to local needs. The challenge for the Commissioner is to ensure that all organisations are able to engage fully with local commissioning processes, including decision making. Given the current economic climate, the Commissioner is committed to commissioning services which adopt a set of clear principles which will underpin the approaches to service delivery. The Commissioner wishes to passport funding to the VCSE sector to allow decisions about victims' services to be victim led and made by those who have a good understanding of the needs of victims. This would be accompanied by 'light touch' accountability systems.

The following proposed options are based on the responses that the Commissioner received from attendees at the Victims Summit held on 11 January 2013.

#### **1) There should be a West Midlands wide structure, led by Victim Support, in consultation with other VCSE sector organisations?**

This approach maximises the capacity and capability of an established organisation, Victim Support, which already has a commissioning process in place. It allows the skills of partner organisations, working with a shared agenda, to make decisions on an informed basis about the needs locally. This would also ensure that the lead agency (Victim Support) uses both the market place and service users working together to define the issue, understand need, and develop a service model based on service requirements.

#### **2) There should be a West Midlands wide structure comprising VCSE organisations?**

This grouping would operate as described above but with no lead organisation. Representation would come from the VCSE sector across the seven local authority areas. This has the potential to maximize the capacity and capability of existing organisations but a mechanism would need to be found for establishing membership of the group and setting up processes and procedures for commissioning.

### 3) The West Midlands Office for Policing and Crime should operate in-house procurement through a commissioning team?

This would require the Commissioner to establish a commissioning structure which does not currently exist. This option potentially does not make use of existing capacity, skills and expertise that exist within Victim Support or other VCSE sector organisations. The latter potentially continuing with commissioning as a result of funding that they may receive from other sources thereby duplicating commissioning structures.

You said:

<b>Option 1</b>	<b>78%</b>	<b>Option 2</b>	<b>18%</b>	<b>Option 3</b>	<b>3.2%</b>
<b>None of the above</b>	<b>0.8%</b>				

#### Option 1

Respondents felt that Victim Support were very well established and experienced in keeping victims of crime as the main focus, had experience of working with all types of crime and also have specialist workers dealing with particular crimes. It was also felt that they had a good structure in place to support victims of crime and had good links within the Force. Some respondents described their service as excellent, and very responsive to the needs of victims. Other comments included

- that marginalised victims get lost within a mainstream organisation such as Victim Support
- there is a conflict of interest for Victim Support who are or perceived to be direct competitors of many of the voluntary and community specialist organisations, and therefore it is inappropriate that a direct competitor takes on the role of administering the commissioning process
- Work needs to be done between Victim Support and the voluntary sector to combat any conflicts of interest as without the trust of the broad range of organisations that work with victims - the structure will not work.
- The commissioning process needs groups that know and understand the specific issues of victims eg. BME groups, women only groups and disability groups
- Option 1 will make best use of existing structures and mechanisms so that setting up commissioning structures is not a consideration, therefore less cost and resources will be involved
- A lead organisation is needed otherwise it may mean that things are not as driven and they could otherwise be.
- There is a need to ensure that there is not one dominant group with the greater power in decision making.
- May be perceived as favouring the continuation of existing Victim Support services over that of other providers.

#### Option 2

There was a view that Victim Support it does not have the requisite knowledge to make accurate judgements about the specific and unique client needs that the VCSE organisations have - because they are seen as a general organisation. It also does not encompass the variation in local need provided by specialist agencies as they have always referred victims needing specialist care to specialist agencies because they are unable to provide these services directly. In order for a new framework to be effective, it needs to ensure that all agencies have trust in it.

Comments included - this option offers the opportunity to lay down a robust structure for utilising the specialist skills that are available across the victim care and support framework and there is also the opportunity to include research expertise within the structure. It supports the diversity of the population of the West Midlands and of the voluntary and community sector - it was felt that voluntary and community sector organisations are clearly sites of authority and expertise and should be at the centre of the structure.

This option gives the opportunity for a non-affiliated Commission, empowered to commission services based on need and to apply scrutiny measures in terms of efficacy, value for money etc. It therefore should lead to a more transparent, needs-based commissioning process, in which the most vulnerable of victims are able to have their needs met.

There are a wide range of victims groups operating across the West Midlands area, many of which provide specialist support for victims. These support services need to be recognised for the work they do and feature as part of a suite of provision which can be accessed by victims across the area. Developing a consortia of voluntary and community groups will provide greater transparency in how future funding for victims services are provided and commissioning decisions made. This should address any perceived bias towards Victim Support, but it may be more difficult to achieve a consensus regarding decision making.

### **Option 3**

This process opens up the commissioning debate and application process with the need to have an assurance of an underpinning in-depth knowledge of victims services. One drawback will be the length of time that the process may take to result in effective commissioning of services that actually respond to the needs of the community it serves. This could lead to the risk of opting for services that have no specialism, but are very good at responding to tenders and providing generalist care approaches as a way of supporting their core costs.

Finances are held centrally and it makes sense to sit all commissioning, performance management, procurement and tendering under one roof.

In order for the commissioning process to have an appropriate spread across the West Midlands, accounts for national good practice and shared learning from the MoJ, EU and HO best practice research, it was felt that the process should not be led by VCSE organisations with an interest. One respondent felt that the best option is an in-house procurement with a specialist advisory group through the Victims Commissioner, advising on need - not wants. Victim Support while representing an umbrella body, are a large competitor of many of the VCSE organisations and relations are at times challenging. Any party with an interest can not have any role in commissioning. Furthermore, commissioning of services needs to account for both localised and regional approaches and where in the past it has not been the case, we have an opportunity to commission services based on needs and partnership with the Force.

### **None of the above**

In line with the Commissioners vision to drive priorities from a local level and passport Community Safety Funds back to Community Safety Partnerships and the newly developing local policing and crime boards, that the money is awarded to CSPs for them to commission the support of victims from the voluntary and community sector, locally based on local need.

Or

That the funding be made available to the 7 CSPs for services to be commissioned across the region from the voluntary and community sector, as collective of CSPs.

## **Appendix**

### **Organisations that responded:**

Coventry Rape and Sexual Abuse Centre  
The Survivors Trust - Victims Support  
National Homicide Service - Victim Support  
Victim Support  
Wolverhampton Domestic Violence Forum  
The Safer Solihull Partnership  
Sai Datta Sarees  
Dudley MBC Community Safety Team  
Grapevine Coventry and Warwickshire Ltd  
Sandwell Women's Aid/Birmingham City Council  
Kairos Women Working Together  
Savana  
Sure Start Blakenhall Children's Centre  
The Haven Wolverhampton  
Sandwell Targeted Youth Support  
Neighbourhood Watch  
Erdington Residents  
West Midlands Police  
Crisis Point  
HMP YO1 Brinsford  
EKTA - Unity Group  
Safer Wolverhampton Partnership  
Barnardos  
Birmingham City Council  
Coventry Women's Voices  
Walsall Housing Group  
St Joseph's Primary School  
Rights and Equality Sandwell  
Flamesurge UK Ltd  
Solihull IAG  
One Point Three Ltd  
Coventry Haven  
Engage Youth Empowerment Services  
Local Neighbourhood Partnership Service  
Wolverhampton Inter-Faith and Regeneration Network  
Wolverhampton Autism Spectrum Support Group  
Solihull MBC  
Imaan Group

Thank you to all the individual members of the public and victims of crime who also took the time to respond to the consultation.