

Cabinet Office's Part 1 Consultation on draft regulations to implement the Procurement Bill

Joint Response from Women's Aid Federation of England, Welsh Women's Aid, Imkaan, End Violence Against Women Coalition, Women's Resource Centre and Rape Crisis England & Wales

Women's Aid is a federation of approximately 170 local domestic abuse members who deliver 300 lifesaving services across England.

Welsh Women's Aid is the national charity in Wales working to end violence against women and girls in all its forms. As a federation, they represent specialist organisations in Wales that provide lifesaving services to survivors of violence and abuse and deliver a range of innovative preventative services in local communities.

Imkaan are a specialist second tier organisation supporting 41 Black and minoritised led by and for organisations across the UK who work tirelessly to end VAWG.

The End Violence Against Women Coalition is made up of 143 specialist women's support services, human rights organisations and experts from across the UK, working to end violence against women and girls in all its forms.

Rape Crisis England & Wales is the charity working to end sexual violence and abuse, providing specialist information and support to all those affected by rape, sexual assault, sexual harassment and all other forms of sexual violence and abuse in England and Wales.

Women's Resource Centre is the leading national umbrella organisation for the UK's women's sector, striving to give voice to the most marginalised and disadvantaged organisations. WRC do this through encouraging and coordinating collaboration and the collective voice of the sector.

QUESTION 1: To what extent do you agree or disagree that CPV codes set out in the draft SI accurately capture those services which can be supplied via a light touch contract under the new regime?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

QUESTION 2: If you disagree or strongly disagree, please indicate which services should be included or excluded, or clarify any other perceived issues with the list such as inconsistencies with other areas of the Bill or draft SI. [NB 2000 character limit]

The current landscape for support services for survivors of domestic abuse and other forms of violence against women and girls (VAWG) is underpinned by poor and inconsistent procurement and commissioning practices. The challenges facing charities in competing fairly in procurement processes are well documented and raised as key concerns within our sector. In particular, the expertise, knowledge and experience needed to deliver high quality support services for survivors is often not given sufficient value with procurement processes which prioritise services at a lower cost, put larger and generic providers at an advantage and effectively lock out smaller specialist local women's services.

This is despite the fact there continues to be high demand for specialist VAWG support services; in 2021-22, 62% of referrals for refuge services in England were declined.¹ Our members report that if competitive tendering continues their services will cease to exist.

Existing Home Office guidance on commissioning VAWG services states that *"commissioning services does not just mean procurement and commissioners should seek to identify the most appropriate method – for example, grant based funding, co-production and preferred provider partnerships."*²

Effectively supporting survivors of VAWG demands specialism and expertise. Therefore procuring these services requires flexibility, as they often must be personalised to the people who need support. The Light Touch Regime is a critical means of ensuring that commissioners can design proportionate procurement processes, which achieve the right outcomes for survivors. **It is essential that support services for victims of VAWG are included as a reservable light touch service.**

Currently, our member services use a variety of CPV codes when a contract goes out to tender, including but not limited to:

- 321000
- 321100
- 410000
- 85000000-90
- 75200000
- 98133100,
- 85300000,
- 85310000
- 85320000
- 85312000
- 8531230
- 85140000
- 85100000

¹ Women's Aid. (2023) The Domestic Abuse Report 2023: The Annual Audit, Bristol: Women's Aid

² Home Office, Violence Against Women and Girls: Supporting Local Commissioning, 2016

The above demonstrates the existing system of CPV codes in the Public Contracts Regulations, and the proposed SI, do not work adequately for specialist VAWG service provision.

We therefore recommend there is a dedicated CPV code for 'support services for victims of violence against women and girls', which is included as a reservable light touch service.

QUESTION 3: To what extent do you agree or disagree that the SI accurately captures those services which should be 'reservable' to public service mutuals under the new regime?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- **Strongly disagree**

QUESTION 3: If you disagree or strongly disagree, please indicate which services should be included or excluded, or clarify any other perceived issues with the list such as inconsistencies with other areas of the Bill or draft SI. [NB 2000 character limit]

We recommend that there be a separate CPV code as 'support services for victims of violence against women and girls', as a Reservable service.