

## **Clinks Response to the Cabinet Office's consultation on a new fund to support the sustainability of voluntary, community and social enterprise sector organisations**

### **About Clinks**

Clinks is the national infrastructure organisation supporting voluntary sector organisations working with offenders and their families. Our aim is to ensure the sector and those with whom it works, are informed and engaged in order to transform the lives of offenders and their communities. We do this by providing specialist information and support, with a particular focus on smaller voluntary sector organisations, to inform them about changes in policy and commissioning, and to help them build effective partnerships and provide innovative services that respond directly to the needs of their users.

We are a membership organisation with over 600 members including the sector's largest providers as well as its smallest, and our wider national network reaches 4,000 voluntary sector contacts. Overall, through our weekly e-bulletin Light Lunch and our social media activity, we are in contact with up to 10,000 individuals and agencies with an interest in the Criminal Justice System (CJS) and the role of the voluntary sector in the resettlement and rehabilitation of offenders.

### **Introduction**

Clinks support the Office for Civil Society in its development of a sustainability fund for voluntary sector organisations. We know that voluntary sector organisations working in criminal justice and community safety are having to adapt to a rapidly changing business environment, significant policy changes, changing service user need, and a reduction in available funding. Clinks' State of the Sector surveys<sup>1</sup> have shown the negative impact this can have on the valuable and effective services delivered by the voluntary sector, especially those services for the most marginalised, excluded and vulnerable people in our communities.

All of our responses are based on intelligence gathered from our extensive contact with voluntary sector organisations working with vulnerable people in the Criminal Justice System. Where possible we have given specific examples of how small to moderate grant funding can elevate the capacity and capability of the voluntary sector to deliver quality services.

Clinks have provided responses to questions where we feel our experience of supporting the voluntary sector has highlighted particularly good practice.

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<sup>1</sup> Clinks (2013) *State of the Sector*, <http://www.clinks.org/eco-downturn> [last accessed 19.07.2014]

**Question 1.1 Reflecting on the journey to sustainability, what types of support will have the greatest impact and why?**

**i. Needs analysis and future planning**

***Support for infrastructure to provide specialist information to increase awareness and understanding***

Voluntary sector organisations delivering frontline criminal justice services need immediate and ongoing support to understand the rapid and complex changes that are taking place in community safety and criminal justice policy, commissioning and delivery. Clinks currently provide this through the Ministry of Justice's infrastructure funding which provides resources that enable Clinks to brief the sector on changes, and track the issues that the sector is facing. This funding is short-term (one year) and comes to an end in March 2015, and we would advocate for the continued support for infrastructure at a national level. In addition, many local infrastructure organisations are well placed to provide locally tailored information and advice. The increased reach of local and national infrastructure will allow for the greatest number of organisations to get information about changes to policy or commissioning practices in a timely manner.

**ii. Specific cost cutting measures**

***Funding for co-design and joint delivery of services through formal strategic networks***

We understand that service reform has to take place in order for the sector to deliver effective services, given the reduced funding both nationally and locally. One way to address this is to support greater collaboration between voluntary sector organisations, and at the same time increase their strategic engagement with local statutory sector decision makers. We would advocate for a genuine push towards more co-design and joint delivery of services. Good examples of local collaboration have been documented in Clinks' 'do it justice' guide 'Developing a Criminal Justice Network'.<sup>2</sup>

**iii. Identifying and establishing new funding sources to identify income**

***Transition funding to support organisations during the shift to a new commissioning and delivery landscape***

Many of the services provided to offenders by the voluntary sector will not be included as mandatory under Transforming Rehabilitation. Tier 1 providers (i.e. prime contractors) will only include these in their supply chains on a discretionary basis, if they believe they will contribute to a reduction in reoffending. Organisations who may find themselves outside of the newly developed supply chains include those who support people who have multiple and complex needs, organisations providing services to ensure the dignity and human rights of prisoners, and those providing services aimed at 'softer outcomes' such as changes in attitudes, thinking and behaviour (for instance through arts interventions).

From initial conversations Clinks has had with Trusts and Foundations about the effect of these changes we understand that many are in the process of considering what this means for their funding priorities. This presents an added challenge for organisations in their planning and fundraising activities.

The Office for Civil Society should consider a period of transitional funding for organisations over the next 2-3 years as the changes introduced by Transforming Rehabilitation become embedded

<sup>2</sup> Clinks (2013) *Do it Justice: Developing a Criminal Justice Network*, <http://www.clinks.org/criminal-justice/do-it-justice> [last accessed 20.07.2014]

in rehabilitation services. Organisations that are in these supply chains are just as likely as those outside it to need support to adapt to this new delivery and commissioning landscape.

### ***Consultancy support for identifying and bidding for specific funds and grants***

When Clinks recently surveyed the voluntary sector working in criminal justice across the North East<sup>3</sup> and Wales<sup>4</sup> we found that many organisations were calling for increased support in accessing various types of funding. Clinks has previously delivered a successful programme called Sustainable Work with Offenders Project (SWOP)<sup>5</sup> and this model could easily be transferred.

### ***Funding to develop new paid-for services and trading opportunities- for example, in order to test new ways of operating***

Many organisations will need to significantly change the way they currently operate in order to adapt to new funding environments. We advise the use of ‘seed corn’ funding, and expert technical assistance, to allow them to test new models of costing and charging for their services, while continuing to deliver existing services before fully committing to a new model.

### ***Capital to enable organisations to participate in ‘payment by results’ funding***

The Transforming Rehabilitation reforms to probation services intend to drive efficiencies with plans to cut costs and introduce payment by results – whereby service providers will only be paid if they succeed in reducing reoffending amongst the offenders they work with. Many voluntary sector organisations are unable to bear the risk of delayed payment involved in such contracts. To ensure that as many organisations are able to engage with the reforms as possible, support in the form of upfront capital should be considered.

In some instances it may be appropriate to provide support which better enables organisations to negotiate funding arrangements with a lead contractor, or to provide guidance to their management and governance levels to assist them in understanding the business risks of signing a payment by results contract.

### ***Support to engage with local funders/commissioners to ensure that opportunities are opened up to voluntary organisations***

Over the last couple of years there have been huge changes to the way local statutory funding for community safety and criminal justice services are structured. This goes further than Transforming Rehabilitation to include the introduction of police and crime commissioners, health and wellbeing boards, and the transference of some responsibility for drugs and alcohol to directors of public health in local authorities.

Many of these commissioners operate across different but overlapping geographies, which has made the local commissioning of services more fragmented. This causes difficulties for the voluntary sector in navigating the environment, and building partnerships with the relevant

<sup>3</sup> Clinks & VONNE (2014), *A snapshot from the North East: the voluntary sector working in criminal justice*, <http://www.clinks.org/resources-reports/snapshot-north-east-voluntary-sector-working-criminal-justice> [last accessed 20.07.2014]

<sup>4</sup> Clinks & University of South Wales, *A snapshot from Wales: the voluntary sector working in criminal justice*, <http://www.clinks.org/sites/default/files/A%20snapshot%20from%20Wales%20-%20the%20voluntary%20sector%20working%20in%20criminal%20justice%20-%20March%202014.pdf> [last accessed 20.07.2014]

<sup>5</sup> Clinks (2012), <http://www.clinks.org/voluntary-community-sector-support-vcs-organisations/sustainable-work-offenders-project-swop> [archived page]

commissioners. Support of this kind would ensure that the sector is able to continue to deliver services and to use its expertise and knowledge to inform commissioning priorities so that service delivery and outcomes for vulnerable people, such as offenders, is improved.

#### **iv. Building capability within organisations**

##### ***Developing core business skills***

Significant skills are required to operate in a commissioning environment which involves payment by results and complex contractual negotiations with large, often private sector, organisations. Clinks has captured intelligence through our Ministry of Justice and Cabinet Office funded legal support helpline<sup>6</sup> that clearly demonstrates the significant needs voluntary sector organisations have in negotiating complex contractual agreements with larger sub-contracting organisations.

Our legal support has focussed on organisations considering entering into contractual agreements under Transforming Rehabilitation. The main enquiries we have received are summarised below:

- Support to assess whether a charity's governing documents are fit for such purpose
- The legal processes behind mergers and consortia
- Sourcing the business and legal skills relevant to negotiating the content of contracts, in particular an ability to cost services based on unit cost and volume flow
- Managing the demands from prime contractors in relation to data management and analysis
- Requirements to comply with various industry standards
- Advice on HR issues, particularly in relation to TUPE
- Support to improve trustee understanding and expertise in the new commissioning environment

The need for support around these issues is likely to be ongoing as commissioners continue to aggregate and retender contracts and seek to commission services over large geographical areas. This support is necessary in order to build new skills in the voluntary sector, in anticipation of future commissioning opportunities.

##### ***Demonstrating impact to funders and/or investors***

Clinks believes that evaluating the sector is about more than just enabling it to demonstrate its impact. As funding becomes scarcer there is a danger that organisations will be led by funders' and commissioners' outcomes and priorities rather than being driven by the needs of service users. As part of Clinks' 'Improving your evidence' project<sup>7</sup>, we heard from numerous voluntary sector organisations that are struggling to meet the varying outcome requirements of different funders, meaning that they are pulled in different directions and prevented from designing and developing coherent outcome measurement tools.

Increasingly criminal justice organisations are being asked to demonstrate their impact based on 1-year reoffending rates. The Justice Data Lab has been set up to help organisations test their impact on reducing re-offending by providing access to this data; yet there are still challenges to using the data, including a requirement to have a cohort of at least 60 service users.

<sup>6</sup> Clinks Legal Support Helpline, <http://www.clinks.org/support-support-vcs-organisations/transforming-rehabilitation-legal-support-project> [last accessed 20.07.2014]

<sup>7</sup> Clinks & NPC Improving Your Evidence: <http://www.clinks.org/support/evaluation-and-effectiveness>

Not all voluntary sector organisations working with offenders and their families exist to reduce reoffending, meaning that they record multiple outcomes such as reduced drug use, increased contact with family members, improved mental health, and access to appropriate housing. Clinks has recently worked with New Philanthropy Capital ([www.thinknpc.org](http://www.thinknpc.org)) and Community Action Southwark ([www.casouthwark.org.uk](http://www.casouthwark.org.uk)) to run a small pilot exploring a framework for shared measurement across a range of organisations. Support to develop similar work would have a positive impact on the local voluntary sector.

### **Question 1.2 How can we best encourage pro bono support alongside paid-for support?**

Transforming Rehabilitation Tier 1 providers are being encouraged by the Ministry of Justice to ensure that they have diverse supply chains in place that include the voluntary sector as a significant provider. These Tier 1 providers could be a possible source of pro bono business advice to organisations, so that they gain the skills necessary to enter the supply chains in the future, or to up-scale small pockets of good practice. Intermediaries, as discussed in more depth in response to Question 2.5 below, may also have a role in facilitating this in order to avoid conflicts of interest and interference with market competition.

Clinks' legal support helpline for organisations entering into negotiations with Tier 1 providers in the Transforming Rehabilitation competition was supported by a triage model. This model allowed for a number of trained Clinks employees to staff a helpline to take initial enquiries. Only organisations that had a clear need for legal support were referred to a solicitor. This approach has limited the costs of professional support by ensuring that the solicitors' time was not spent on non-legal queries.

### **Question 1.3 Are these the right factors for identifying those in need?**

Clinks agrees with all the factors outlined in the consultation document as signs that an organisation is in need of support. In particular, our most recent State of the Sector survey<sup>8</sup> revealed that a reliance on a small number of sources of funding was prevalent in the sector, with many organisations focused on the delivery of one project at a time. In particular, many organisations are dependent on statutory sector income<sup>9</sup>, alongside some funding from trusts and foundations, because working with offenders is not a cause that attracts significant public donations. The introduction of the Transforming Rehabilitation reforms will significantly change the structure and availability of statutory funding, meaning that there will now be significant risks to the income of some organisations (although for others it poses an opportunity).

We would also point to a number of additional vulnerability factors:

- Whether organisations are achieving full cost recovery. In Clinks' last State of the Sector survey only half of respondents were doing this.
- Whether organisations can point to an increase in service user need that they are unable to address. This was highlighted in our State of the Sector survey, and also features in Clinks' Run Ragged report on the state of services for women offenders<sup>10</sup>.

<sup>8</sup> Clinks (2013) *State of the Sector*, <http://www.clinks.org/eco-downturn> [last accessed 19.07.2014]

<sup>9</sup> Third Sector Research Centre (2010), *The role of the third sector in work with offenders: the perceptions of criminal justice and third sector stakeholders*, <http://www.birmingham.ac.uk/generic/tsrc/documents/tsrc/working-papers/working-paper-34.pdf> [last accessed 20.07.2014]

<sup>10</sup> Clinks (2014), *Run Ragged: interim report*, <http://www.clinks.org/resources-reports/run-ragged-interim-report> [last accessed 20.07.2014]

**Question 1.4 What might be an effective approach to identifying those in need particularly given that these factors could be seen as negative and organisations might be unwilling to admit to them?**

Local and specialist infrastructure organisations could be used to provide an initial assessment of organisations' needs. These organisations will tend to have the trust of voluntary sector organisations because of their role as a support mechanism to the sector. For this reason they often have a relationship where information of this sort is shared in confidence. A benefit of such an approach could be that infrastructure organisations could then specifically provide a lower level of support to those who are not successful in their applications, or at least signpost to other sources of support.

**Question 1.5 We intend to use the DWP definition of vulnerable and disadvantaged. Should we also include any additional groups?**

The DWP definition of vulnerable and disadvantaged is extensive and incorporates the majority of the people we would expect to see. Clinks would point out that the category of offenders/ex-offenders/prisoners /detainees encompasses individuals from many of the other categories. For instance, ex-members of the armed forces, care leavers, victims of crime, those who have experience of violence and sexual abuse, the homeless and those at risk of suicide and self-harm. The vast majority of these categories are over represented within the offender population.

We recommend the inclusion of individuals with mental health issues, specifically personality disorders and those with low level mental health issues, which often do not meet the threshold for statutory support. Furthermore we would add individuals with learning difficulties, who are also often over-represented within the Criminal Justice System.

**Question 1.6 How would we ensure that support is appropriate to local need?**

Given the scale of the changes to the commissioning of criminal justice services, the need is likely to be similar across the country. Where possible Clinks would advocate engaging with local infrastructure organisations to support a more localised assessment of needs amongst the voluntary sector. This will allow for a more targeted approach to be taken when offering different types of support. As well as geographically sensitive support, we would advocate for support to be considered in thematic areas, such as criminal justice, so that it can directly address the needs of organisations in those sectors.

**Question 1.7 What evidence is there of particular need in particular locations?**

A recent survey by Clinks in partnership with Voluntary Organisations' Network North East (VONNE) identified that many organisations providing criminal justice and community safety services in the North East were supported by regional charitable funders such as the Northern Rock Foundation, which is closing its grant programme at the end of 2014. Many felt that their funding was unstable and were targeting a significant amount of effort at identifying alternative funding sources.

Shifts in the availability of funds, in particularly regional funding sources, have the potential to take place anywhere and therefore this fund should be alert to this possibility and willing to engage with infrastructure organisations who can point to these trends.

In addition we understand that this fund will be targeted at organisations in England, but would point out that the criminal justice sector in Wales will be equally affected by the forthcoming Transforming Rehabilitation reforms, and equally in need of support.

**Question 2.1 Could we use a light touch self-assessment tool that would identify the likelihood that an organisation is appropriate from simple evidence data?**

Clinks' experience in providing consultancy support to voluntary sector organisations is that they can find it difficult to assess or diagnose issues affecting their own organisation, and may not identify issues correctly. Face to face assessments are costly, but are the best way to clearly identify what support an organisation requires. Alternatively, providing telephone support, such as Clinks' Legal Support Helpline, to assist with the completion of a simple assessment tool could allow for more probing questions in order to identify support needs more effectively.

**Question 2.2 Are there existing tools that would enable us to do this?**

Clinks has previously developed a number of tools for organisational self-assessment. We have produced a 'Contracts Readiness Checker' in partnership with Locality<sup>11</sup> to help organisations to understand the financial competencies and management systems required to be contract ready. We have also produced 'Take your Temperature: a brief organisational health check', which is an easy-to-use tool to help assess organisational strengths and weaknesses in the context of a rapidly changing funding landscape and to flag up areas that require development.

**Question 2.3 Could we use existing local knowledge to identify appropriate organisations, for example by utilising a nomination approach?**

We would suggest an application rather than nomination process, so that the net can be spread as wide as possible. We believe that local and specialist infrastructure organisations could be used to support and sift the application process. There is a danger that some organisations might be missed, or excluded, using a nomination process. This could be because they are not working closely with statutory partners, or because they are working on a new/emerging area of need. In addition, because of historic funding patterns, criminal justice organisations might be more or less visible to their local infrastructure organisations which could inadvertently exclude them from the process.

**Question 2.4 Which local bodies or partnerships could best provide local knowledge?**

All of the bodies listed in the consultation document may be able to provide local knowledge and intelligence. We would like to add to this list by suggesting that there is a role for specialist infrastructure, who do not necessarily hold the same level of local knowledge but have an excellent level of knowledge in regards to their sub-sector (in our case criminal justice).

In addition, some areas have a local Safer Future Communities network, which are led by local infrastructure organisations, supported by Clinks, with Home Office funding<sup>12</sup>. These networks bring together organisations working in criminal justice and community safety across police and crime commissioner areas. The strength and reach of each of these networks varies across local areas, and so a mixed model would be needed, as some areas will have less capacity to support criminal justice specific voluntary sector organisations.

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<sup>11</sup> Clinks (2013), 'Finance for contract readiness checker', <http://www.clinks.org/resources-guides-toolkits/finance-contracts-readiness-checker> [last accessed 20.07.2014]

<sup>12</sup> Clinks (2013), Safer Future Communities Project, <http://www.clinks.org/sfc> [last accessed 20.07.2014]

**Question 2.5 How could a model like this using third party intermediaries be made to work effectively?**

Clinks have been involved in and is aware of several projects that provide technical assistance to the sector that have proven valuable and might provide useful learning for this fund. We have provided a number of examples below:

- a) Through our involvement in the Transition to Adulthood (T2A) Alliance, we worked to produce a guide for organisations working with service users aged 18-24, with a staged approach to developing effective services<sup>13</sup>. In 4 areas across England and Wales, we then used the guide to assess how organisations developed the relevant services, identifying a baseline and then providing support for them to progress to the later stages.
- b) Clinks is also a member of the Making Every Adult Matter (MEAM) coalition with Mind, DrugScope and Homeless Link<sup>14</sup>. Through this we have been supporting ten areas with ongoing consultancy to develop interventions for service users with multiple needs across these user groups. As well as supporting them in client identification and needs assessment, this has also included significant brokerage support to develop local partnerships. As a result of this work, some of these projects have now sourced independent funding to deliver these services. All the MEAM partners also act together as a local networks team, providing peer support to each other.
- c) Clinks are also providing support to the successful partnerships that are being funded by the Big Lottery programme 'Fulfilling Lives: tackling complex and multiple needs'. This support uses a diagnostic model, every two years, to facilitate the local partnerships to identify their support needs, and then provide consultancy support to meet those needs.
- d) Organisations that benefited from the National Offender Management Service Co-Financed Organisation's consortia development programme have been extremely positive about the high quality technical assistance they received.

**Question 2.6 Is there an appropriately sized and experienced body of potential intermediaries available to fulfil this role?**

An intermediary model as set out would potentially be effective, and also maximise the existing knowledge and expertise in the sector.

We believe that the model should explicitly include infrastructure organisations. A great deal of infrastructure activity fulfils the awareness and understanding stages of the journey to sustainability, and the varied range of local and specialist infrastructure organisations would also be an asset. We don't believe that any one single organisation would be able to fulfil this role adequately, due to the varied expertise and skills that would be required to fully understand the needs of such a diverse voluntary sector.

Careful thought should be given to what support can be provided through generic infrastructure organisations, and what requires more specialist sector specific knowledge. Clinks would suggest that any pool of intermediaries should include those with sector specific experience as well as generic infrastructure organisations.

<sup>13</sup> Clinks & T2A (2013), *Going for Gold*, <http://www.clinks.org/going-for-gold> [last accessed 20.07.2014]

<sup>14</sup> Making Every Adult Matter (MEAM) Coalition, [www.meam.org.uk](http://www.meam.org.uk) [last accessed 20.07.2014]

**Question 2.7 How would we ensure that intermediaries are appropriately held to account and challenged to deliver effectively?**

Clinks would recommend an approved provider model with a clear application process for appointment and transparency as to why they have been selected. We believe this should take into account an organisation's track record in providing similar support. Organisations could then be empowered to identify both the support they need, and the provider that they believe has the capability to deliver that support.

There are a number of other mechanisms that could be used to ensure accountability throughout the programme. This might include peer support and networks, or anonymous feedback routes, which would give beneficiaries the opportunity to share different support experiences and constructively evaluate the support they received.

**Question 2.8 Should we set upper and lower limits on organisation size?**

In thinking about setting upper and lower limits on organisation size, Clinks would observe that what constitutes a medium sized organisation in one sector may be different in another.

**Question 2.9 If so:**

**What lower limit would be appropriate for identifying organisations having the desired impact in communities?**

The composition of the voluntary sector working in criminal justice is summed up well by the Centre for Social Justice report, *The New Probation Landscape*:

- There are an estimated 1,475 charities, social enterprises and voluntary organisations whose main clients are offenders, ex-offenders and their families in England. Of these organisations, there are a large number who are relatively small. Almost one in twenty (4.8 per cent) reported no income whatsoever, whilst more than half (51 per cent) reported an annual turnover or income of £150,000 or less. Just under a quarter (23 per cent) recorded an income greater than £500,000 and three per cent greater than £5 million.
- However this masks the fact that there are a handful of organisations with far larger incomes that deliver a considerable number of interventions in the criminal justice sector, for example CRI (income: £100m), Turning Point (£80m), Nacro (£71m) and Catch 22 (£48m).
- Most voluntary organisations working with offenders, ex-offenders and their families have few employees. A quarter (24 per cent) said they had no full-time equivalent (FTE) employees; whilst 69 per cent reported having ten or fewer. Only four per cent reported having more than 100 FTE.<sup>15</sup>

Based on this, the proposed lower limit of £50k seems fair and we feel that this would adequately filter out the very small organisations with little governance, or that are volunteer-run, who would not benefit from this form of support.

<sup>15</sup> Centre for Social Justice (2013),

<http://www.centreforsocialjustice.org.uk/UserStorage/pdf/Pdf%20reports/landscape.pdf> [last accessed 20.07.2014]

**What upper limit would ensure that organisations that shouldn't need support are excluded?**

16% of the organisations on our database have a turnover of over £1m and therefore we would suggest that for organisations working in criminal justice the upper limit of £1 -£1.5m is appropriate.

**Should we have a phased upper limit with high turnover organisations considered in exceptional circumstances?**

We believe that there may be exceptional circumstances within which larger organisations are considered for support. For instance, Clinks' legal support project used an upper limit of £5m, partly due to the fact that legal advice is particularly expensive and can, in some cases, be out of the reach of even larger organisations. A phased upper limit of between £1m and £5m should be considered, in order to capture those who might initially find themselves outside of large commissioning opportunities, with a great need to reform their service structures or organisational strategies.

**Question 2.10 What average level of funding would enable appropriate depth of activity for individual projects, whilst ensuring broad reach across the sector?**

Given the breadth of proposed beneficiaries for this fund, there is a danger that it will be hugely over-subscribed. In addition, funding may be sought for a vast range of activities, each of which would require different levels of funding. We therefore suggest that a number of categories for activities could be used, each with a different cap on the size of grant. This would allow for a range of activities to be funded across a breadth of organisations without limiting the size of an average grant too much. These categories could be based on the overarching areas outlined in Section 1 of the consultation.

**Question 2.11 Are these the right ways to incentivise effective engagement?**

Clinks has reservations about some aspects of the solutions proposed. We would question how an output or outcomes based payment would be measured in the relatively short lifetime of a fund that aims to create longer term impact. We would also warn that creating overly onerous reporting mechanisms for such a fund could be counter-productive, as it may take time away from vital development work, as well as the continued delivery of services.

**Question 2.12 Which are likely to be most effective?**

We would welcome requirements for named individuals from senior leadership teams and trustees, and for ongoing external challenge of plans and activities by a panel of experts and peers. There might be potential for peer support across beneficiaries and providers of the fund in the form of network meetings or action leaning sets, for instance.

**Question 2.13 What other ways could we ensure effective engagement from all parties?**

A requirement for frontline organisations to make some financial commitment to the project might represent too great a barrier for organisations that are already struggling. An alternative could be to ask for some form of in-kind contribution through staff or trustee time, clearly quantified using a day rate. However, it will be important for this requirement to not be too high as it could then still represent a significant barrier.

**Question 3. 1 Which of the proposals for achieving sustainability do you think are likely to be most effective? How else can we ensure lasting impact?**

As outlined in our answer to question 1.1, the funding environment for criminal justice voluntary sector organisations is becoming increasingly challenging: local commissioning structures have become fragmented, Transforming Rehabilitation contracts pose significant challenges for many organisations, and trusts and foundations increasingly perceive the delivery of criminal justice and community safety services as covered by statutory funding.

Therefore, alongside sustainability support for the sector, there is a need for the Office for Civil Society and Cabinet Office to continue its work with local commissioners to encourage greater co-commissioning, and to liaise at a strategic level with trusts and foundations to ensure that diverse funding streams are maintained. Clinks is currently pursuing some activity around this and would be keen to discuss how we might work in partnership with the Cabinet Office.

The idea of using the 2015/16 fund to provide a legacy beyond the end of the fund is an interesting one. However, it is unclear whether this would leave sufficient funds to directly support the sector in the same period. The criminal justice voluntary sector is facing immediate challenges so any delay in support could mean the loss of services in the meantime. In addition, it is difficult to see how much the fund would be likely to grow in this period of time.

**Question 4.1 In addition to the types of support described in this consultation document, what ideas do you have that could help organisations build their sustainability?**

We would also note that a significant number of voluntary sector organisations working in criminal justice are smaller and therefore unlikely to benefit from this fund. However, these organisations also require support in the changing landscape and we would suggest that future initiatives might also consider how to meet their needs.

**Question 4.2 What other mechanisms of delivery could the fund explore in order to better reach beneficiaries?**

We would reiterate the key points made elsewhere in this response:

- Infrastructure organisations have a key role to play in enabling organisations to become sustainable and should be utilised in any model of support used by the fund.
- The voluntary sector working in criminal justice is facing significant challenges in adjusting to a rapidly-changing external policy environment.
- Local commissioning has become fragmented, with a lack of joined-up commissioning undermining the voluntary sectors' ability to engage, and trusts and foundations are not necessarily aware of, and prepared to fill, the resulting gap.
- We would conclude by observing that all of the above have the potential not only to impact upon the voluntary sector itself, but to its service users, and especially those whom statutory agencies find harder to reach.



supporting voluntary organisations that  
work with offenders and their families

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