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until women & children are safe



Domestic Abuse Housing Alliance



NATIONAL HOUSING FEDERATION



For women and children. Against domestic violence.

National Federation of ALMOs  
championing better homes and communities



agenda  
Alliance for Women & Girls at Risk



STANDING together  
against domestic violence

St Mungo's  
Ending homelessness  
Rebuilding lives

## Joint response to Ministry of Housing, Communities and Local Government's

### "Tackling Homelessness Together" Consultation

The National Housing and Domestic Abuse Policy and Practice Group, led by the [Domestic Abuse Housing Alliance](#) (DAHA), aims to find consensus, share best practice and influence policy and practice on domestic abuse and housing in England and devolved authorities. We recognise that those who have experienced domestic abuse or violence and other forms of abuse from an intimate partner or family member in the home, have insight and knowledge that service providers can learn from to improve joined up multi-agency working. It is for this reason that we aim to ensure survivors' perspectives are embedded in the effective planning, delivery and monitoring of partnership initiatives. We work together nationally to ensure:

- The experience of survivors of domestic abuse is more prominent in the housing sector and helps shape improved and enhanced service delivery;
- Women and children can access secure housing and good quality services when experiencing domestic abuse; and
- Co-ordination exists between the housing and Violence against Women and Girls (VAWG) sectors with regards to domestic abuse.

The group has representatives from the domestic abuse, LGBT+, housing and homelessness sectors. The following members of the group are submitting a joint response to this consultation:

- DAHA
- Women's Aid
- AVA
- Surviving Economic Abuse (SEA)
- Shelter
- Crisis
- Agenda
- St Mungo's
- National Federation of ALMO's
- Refuge
- Respect
- National Housing Federation
- Chartered Institute of Housing
- Homeless Link

Together, we welcome the opportunity to respond to the Ministry of Housing, Communities and Local Government (MHCLG)'s consultation on improving accountability and partnership arrangements for tackling homelessness. As national organisations, we do not respond to the questions proposed on specific local arrangements or partnership mechanisms, but seek to highlight why the response to domestic abuse must be an essential part of proposals to improve homelessness service provision and ensure that everyone has a secure place to call home.

In summary, our consultation response:

- Raises concern that domestic abuse, a core driver of women's homelessness, is not mentioned anywhere within the proposals for improving accountability arrangements;
- Recommends that proposals for new Homelessness Reduction Boards are considered alongside proposed arrangements for the future funding and accountability arrangements for domestic abuse services, which MHCLG published for consultation on 13 May;
- Recommends that, alongside plans to implement Homelessness Reduction Boards, Government make an urgent investment in tackling women's homelessness across the board - including sustainable funding for domestic abuse and VAWG services, funding for women-only homelessness services across the country and an increased supply of genuinely affordable housing;
- Highlights that the 'whole housing approach'<sup>1</sup>, which delivers best practice partnership working between the housing, homelessness, domestic abuse and violence against women and girls sectors needs to be scaled-up across the country;
- Recommends that all homelessness data, including rough sleeping counts, include a gender breakdown and that the new data pilots include a dedicated work stream on recording and measuring women's homelessness;
- Calls for an automatic assumption of 'priority need' status for survivors of domestic abuse to be included within the Domestic Abuse Bill, as part of a package of measures to improve the housing response to domestic abuse and tackle the drivers of women's homelessness.

We wish to highlight that an effective delivery of a 'whole housing approach' relies on an increased supply of genuinely affordable accommodation.

## **1. Domestic abuse and homelessness**

Domestic abuse is, by its very nature, a housing issue and a core driver of homelessness. The Home Office estimate that domestic abuse resulted in £550 million in housing costs to Government in the year ending March 2017, including temporary housing, homelessness services and repairs and maintenance<sup>2</sup>. As domestic abuse and other forms of violence against women and girls (VAWG) typically occur within the home, the response from the public and private housing and homelessness sectors to this form of crime is crucial in delivering an effective response. Lack of access to safe, secure housing is a major barrier to escaping and factors strongly into a survivors' decision making about whether they stay in, or leave, an abuser. Women are most at risk at the point of, or shortly after, separating from an abuser and over half of women killed by men in 2017 were killed in their own home, or the home they shared with the perpetrator.<sup>3</sup>

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<sup>1</sup> The 'whole housing' approach aims to: improve housing options for families affected by domestic abuse; and provide a plethora of housing options to people experiencing domestic abuse understanding families will be on a spectrum of need. It is being funded by MHCLG in the London Tri-Borough, Cambridgeshire and Peterborough, and Stockton-on-Tees.

<sup>2</sup> Oliver, R., Alexander, B., Roe, S. & Wlasny M. (2019) The economic and social costs of domestic abuse. Published online: Home Office

<sup>3</sup> Femicide Census (developed by Karen Ingala Smith and Women's Aid Federation of England working in partnership, with support from Freshfields Bruckhaus Deringer LLP and Deloitte LLP). (2018) *The Femicide Census: 2017 findings. Annual Report on cases of Femicide in 2017*. Published online: Karen Ingala Smith and Women's Aid.

Many survivors, particularly those who are women, face a serious risk of homelessness if they are to escape a perpetrator. Over one in ten of all homeless acceptances in England were accepted as homeless by a local authority because of a relationship breakdown due to domestic abuse in 2010.<sup>4</sup> Research by homelessness and domestic abuse organisations shows that the true scale of the problem is far greater, and that women's and survivors' homelessness is often 'hidden'. St Mungo's research has shown that almost half of their female clients had experienced domestic abuse and a third (32%) of the women they work with said domestic abuse had contributed to their experiences of homelessness.<sup>5</sup> Crisis' 2014 'Nations Apart' research found that 61% of homeless females and 16% of homeless males had experienced violence and or abuse from a partner.<sup>6</sup> Agenda's research shows that 1.2 million women in England have experienced extensive abuse as both a child and an adult, and a fifth of these women have been homeless. By comparison, only 1% of women with little or no experience of abuse have been homeless.<sup>7</sup>

The prevalence of economic abuse exacerbates the issue of women's homelessness. Defined as when someone interferes (through control, exploitation or sabotage) with their partner's ability to acquire, use and/or maintain economic resources<sup>8</sup>, economic abuse reinforces or creates economic instability, in turn leaving victim - survivors without the financial means to access housing or afford their current housing provisions. Research by Surviving Economic Abuse suggests that at least six in ten women will experience economic abuse within the context of domestic abuse.<sup>9</sup> The long-lasting impacts of economic abuse, often leading to financial ruin for the victim – survivor, also means that this form of domestic abuse can cause homelessness many years after a survivor has left a relationship.

Women's homelessness is 'hidden'. Women tend to rely on informal arrangements with friends, family and acquaintances, including 'sofa-surfing', and finding 'hidden' places to sleep to avoid further abuse. Research from the Women's Aid's No Woman Turned Away (NWTa) project, which MHCLG provide funding for, has shown that that, of the 264 women trying to access refuge accommodation supported by the project in 2017-18: 11.7% were forced to sleep rough, of which three women were pregnant and five women had their children with them; and almost half of women (46%) were forced to sofa-surf, of which 65 women sofa-surfed with their children. These are not safe alternatives, and can often mean women are forced to enter into unsafe and exploitative living situations. One woman supported by the project disclosed that she was sexually assaulted when 'sofa-surfing' at a family friend's house. For nearly one in ten women (8%) supported by the NWTa project in 2017-18, the experience of trying to escape - but being unable to find a place of safety - meant that they gave up their search and returned to the perpetrator.<sup>10</sup>

Women and children who do escape can then face years moving between sleeping rough, unsafe and unsuitable temporary accommodation, or waiting for social housing. These experiences can have highly damaging impacts on survivors and can impede recovery from trauma. Women's interrelated experiences of homelessness and abuse are particularly complex; rough sleeping women tend to be younger than men, homeless women are more likely to experience mental ill health, and the average age of death for a homeless woman is

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<sup>4</sup> The Department for Communities and Local Government (DCLG), Live Tables on Homelessness, Table 774. Available at: <https://www.gov.uk/government/statistical-datasets/live-tables-on-homelessness> [accessed: 12/04/19]

<sup>5</sup> St Mungo (2014) Rebuilding Shattered Lives: <https://www.mungos.org/publication/rebuilding-shattered-lives-final-report/>

<sup>6</sup> P. Mackie and I. Thomas, Nations Apart? Experiences of single homeless people across Great Britain, London, 2014, Crisis).

<sup>7</sup> Agenda (2016), Hidden Hurt

<sup>8</sup> Adams, A. E., Sullivan, C. M., Bybee, D., & Greeson, M. R. (2008). Development of the Scale of Economic Abuse. *Violence Against Women*, 14(5), 563

<sup>9</sup> Sharp, N. & Learmonth, S. (2017) Into Plain Sight: - How economic abuse is reflected in successful prosecutions of controlling or coercive behaviour

<sup>10</sup> Women's Aid, Nowhere To Turn: Findings from the Second Year of the No Woman Turned Away Project. Women's Aid, 2018.

shockingly low at 42.<sup>11</sup> Homelessness services, however, are largely designed for men's needs and these male-dominated environments can be unsafe for women and unable to meet their distinct needs.<sup>12</sup>

Walby (2018) argues that minimum standards for access to housing may be more important than increasing criminalisation of domestic abuse. Walby and Towers (2017) point to the resilience of victims of domestic abuse being compromised due to lack of access to structural and, as outlined above, in particular economic, resources (Walby et al., 2016). Changes to welfare benefits, including Universal Credit (UC), are also a key driver of homelessness those experiencing domestic abuse. We are concerned that reforms to welfare policy are helping to facilitate financial control and abuse by creating entitlement to economic resources, concentrating resources and power in the hands of the abuser and taking away women's economic autonomy.

Not only do benefits sanctions and delays have a big part to play in homelessness - with research by Crisis revealing that 21% of respondents said they became homeless as a result of being sanctioned<sup>13</sup> - simply being in receipt of benefits can make it difficult for people to access certain types of housing. Private landlords can be reluctant to rent to those in receipt of housing benefit or who are already homeless leaving some people with very limited housing options, especially those who do not meet the priority need criteria to be assisted by a local authority. UC payments are paid directly to claimants rather than to a landlord, which increases the perception of claimants as "high risk" tenants. Private home owners are frequently given misinformation, or no information at all about their rights to housing benefits or UC when they contact local authority housing benefits teams. Further, many people aren't aware that housing benefit or UC assessments can disregard 'capital' such as value of a home for 26 weeks so that survivors can access safe accommodation (and this can then be extended as long as proof can be given that steps are being taken to sell the property). Given that many people experiencing abuse don't always realise that renting somewhere else is a financially viable option, they can be forced to remain put with a perpetrator - or become part of the 'hidden homeless' and sofa surf.

Access to safe housing options for survivors of domestic abuse is essential. Without it, survivors are confronted with the 'option' of facing homelessness and housing insecurity, or having to return to a perpetrator. As has been well documented, funding for refuges and other forms of safe accommodation for survivors - including homelessness provision that meets women's specific needs - remains insufficient to meet demand.<sup>14</sup> Our concerns about this, and the devastating impact it can have on survivors' lives, are well known within government and are not the subject of this response. In this submission, our organisations focus on the importance of aligning and integrating accountability arrangements, strategies and policies on domestic abuse and VAWG with those on housing and homelessness.

The 'whole housing' approach is underpinned by the understanding that housing, homelessness and domestic abuse and VAWG are interconnected issues and a joined up approach is essential. Our organisations are calling for a 'whole housing approach' to ensure that no survivor is faced with such a devastating choice. The approach aims to improve the response of the housing sector to domestic abuse and deliver a full suite of safe housing options to survivors - including within the private sector, supported accommodation, social housing, sanctuary schemes and initiatives such as Housing First - and is underpinned by refuge provision to deliver crisis, specialist support to women and children escaping from life-

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<sup>11</sup> Agenda, Briefing on Women's Homelessness, January 2019

<sup>12</sup> Agenda, Briefing on Women's Homelessness, January 2019

<sup>13</sup> Crisis, Homeless people's experiences of welfare conditionality and benefit sanctions (2015)

<sup>14</sup> Women's Aid (2019) The Domestic Abuse Report 2019: The Annual Audit, Bristol: Women's Aid

threatening harm. We aim to tackle the considerable current variation in the response of housing providers to domestic abuse. For example, research from Scottish Women's Aid (2016) on the response to perpetrators found that in the Fife Housing Partnership, that two thirds of service providers did not know if housing services could take action against a perpetrator of domestic abuse. Conversely, research carried out in Wales showed that 40% of tenants who identified as victims of domestic abuse had anti-social behaviour complaints made against them.<sup>15</sup> Inadequate responses from providers to both survivors and perpetrators have serious safety implications, increase the risk of survivors experiencing a housing crisis, and fail to provide adequate housing options for survivors and their children.

Currently, we remain concerned that efforts to tackle homelessness and domestic abuse and VAWG are siloed at both national and local level, and that existing accountability structures do not co-ordinate joint activity effectively. This limits the effectiveness of government action and spending on either issue, means that women's specific needs continue to be side-lined in the response to homelessness and constrains attempts to truly 'tackle homelessness together'.

## **2. New accountability arrangements**

We agree with the government that the challenge of reducing homelessness is not always given the attention required under existing statutory and partnership structures at local level. This is particularly the case for women's homelessness, which continues to remain 'hidden' and side-lined in the response to homelessness prevention and provision. We are concerned, therefore, that the consultation proposes new accountability arrangements - namely the creation of new Homelessness Reduction Boards - that have been developed in silo to MHCLG's work on domestic abuse. There is no detail provided on how new accountability arrangements would work to tackle the drivers of women's homelessness - namely domestic abuse and VAWG - or meet their specific needs, and no reference to how these Boards would align with local multi-agency partnerships on domestic abuse and VAWG.

The scale of both homelessness and domestic abuse within England mean that the multi-agency, collaborative, localised approach advocated within the MHCLG's proposals is a necessary measure, but if homelessness is to be reduced and prevented then the causality between domestic abuse (in all its forms, including economic) and homelessness must be at the fore of the proposed Homelessness Reduction Boards and any other measures implemented or initiatives pursued.

Strengthened local accountability arrangements for homelessness could be a positive step forward if there was a specific mandate for delivering a strategic approach to reducing women's homelessness in local areas, overseeing service provision to meet women's specific and multiple needs, and ensure an integrated approach to the response to domestic abuse and VAWG. To be effective, it is paramount that new accountability arrangements reflects the myriad causes of homelessness. Membership of the Boards would need to include local authority VAWG strategic leads, and there would need to be clear engagement with domestic abuse and VAWG services (including those with specialisms in economic abuse and hence coerced debt), and multi-agency partners including local authority housing benefit teams and Jobcentre Plus. The relationship between new accountability arrangements for homelessness and existing structures such as Community Safety Partnerships and Child and Adult Safeguarding Boards would also need to be clarified. Without such a clear mandate and engagement, we are concerned that such a new structure will increase - rather than address - our concerns with siloed working.

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<sup>15</sup> Jackson, Rebecca (2013) The Role of Registered Social Landlords in tackling domestic abuse in Gwent and the wider implications.

The postcode lottery in the response to domestic abuse and VAWG remains severe, with many essential support services operating with no local authority funding at all<sup>16</sup> and a range of local oversight arrangements. We are particularly concerned, therefore, that this consultation has been developed in isolation from the MHCLG's publication of a review of local domestic abuse service commissioning in England, and their commitment to set out proposals for new sustainable funding and accountability arrangements for accommodation based domestic abuse services. Published on 13 May 2019, these proposals include a new four-part statutory duty on local authorities to provide accommodation-based domestic abuse services, to be delivered through the Domestic Abuse Bill. Before any further decisions are taken on the structure, purpose and functions of Homelessness Reduction Boards we recommend that MHCLG align these two processes.

It will be essential for future accountability arrangements for domestic abuse, and for homelessness, to be developed in a joined-up way at both local and national level - including across government departments, such as MHCLG, the Home Office, Ministry of Justice and Department for Work and Pensions, currently working on these issues. We therefore recommend:

- MHCLG's proposed new accountability arrangements for accommodation-based domestic abuse services to be considered and developed in tandem with proposed changes to accountability for tackling homelessness;
- Homelessness Strategies, and Supported Housing strategies must align with and be developed alongside Violence Against Women and Girls (VAWG) strategies (or Domestic Violence and Abuse strategies) on both a local and national basis;
- The government's work to tackle homelessness is integrated with the approach to tackling domestic abuse and VAWG across all departments.

### **3. Effective partnership working**

Local partnership working - across local authorities, the private rented sector, housing associations, social landlords and the private rented sector, and domestic abuse and VAWG services - is essential to underpin the 'whole housing approach' and deliver the government's aim to ensure everyone has a safe place to call home. We welcome MHCLG's focus on improving effective local partnership working, and learning from best practice, in this regard.

Partnership working - including with specialist domestic abuse services and statutory agencies - is one of the eight core standards within the Domestic Abuse Housing Alliance (DAHA) accreditation, which all housing providers should be encouraged to seek as the benchmark for a robust response to domestic abuse.<sup>17</sup> DAHA is grateful for MHCLG funding for a 'Whole Housing approach' within three pilot areas in the London Tri-Borough, Cambridgeshire and Peterborough, and Stockton-on-Tees. The Whole Housing Mission is:

- To improve housing options for families affected by domestic abuse through a 'Whole Housing Approach';
- To provide a plethora of housing options to people experiencing domestic abuse understanding families will be on a spectrum of need.

The programme's vision is to develop and model Whole Housing approaches and to evaluate their impact in terms of reducing homelessness, increasing tenancy sustainment and early intervention and providing move on options for families experiencing domestic abuse. The Whole Housing approach provides individual support to a diverse range of people who have directly experienced domestic abuse and their children to ensure the

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<sup>16</sup> Women's Aid (2019) The Domestic Abuse Report 2019: The Annual Audit, Bristol: Women's Aid

<sup>17</sup> Domestic Abuse Housing Alliance, <https://www.dahalliance.org.uk/accreditation> (Accessed 30 April 2019)

accommodation they have is safe, and to ensure that safety measures are used wherever possible. This includes private housing (owned and rented), social housing, refuges, or any other accommodation type.

Elements of the 'Whole Housing approach', which demonstrate the impact of effective partnership working, are already delivering results. In Tyne and Wear, for example, housing providers came together to offer up a quota of properties that could be immediately offered for victims of domestic abuse. Other examples of best practice are listed below.

#### *Housing First*

Standing Together Against Domestic Violence (STADV) have been working towards developing the Housing First model for women experiencing VAWG and chronic homelessness in the tri-borough area. Four housing providers including national provider Peabody, and local provider Women's Pioneer Housing have committed their support to provide ten units for a VAWG Housing First pilot. The pilot will be one of the first 'Housing First' partnerships of its kind between the women's sector and registered providers. As only 50% of housing first projects across England have access to social housing, this is an innovative and valuable partnership agreement and we look forward to seeing how this develops. We recommend that these best practice examples in tackling women's housing, domestic abuse and other needs through a 'whole housing approach' are scaled up nationally and implemented consistently.

#### *Housing Operational Groups*

Work by STADV in the London tri-borough, which brings together housing providers into an operational group to focus on domestic abuse, is another model example. The housing operational group in the tri-borough provides a mechanism for housing providers and the local authority to share information, collaborate, and improve communication to tackle domestic abuse, and this is guided and monitored by domestic abuse specialists to ensure that their work is safe, effective, and responds to changing needs and priorities.<sup>18</sup> This model ensures partners work together to improve the whole housing approach at a local level, and should be considered by MHCLG when determining future effective partnership approaches. The group meets quarterly and membership consists of local authority housing services, housing association, homelessness services and local specialist domestic abuse services. The group's main activities include:

- Sharing data to monitor the local response and quality of the coordinated community response;
- Holding workshops with guest speakers representing best practice in relation to VAWG policy and practice responses, which members then cascade within their own organisations to improve operational responses and referral pathways.

#### *Pan-London Housing Reciprocal*

Another important example is the Pan-London Housing Reciprocal, co-ordinated by Safer London. This is a voluntary collaboration between local authorities and registered housing providers in London, enabling landlords who refer their tenants for a move, in exchange, to rehouse other applicants who are at risk of harm where they live. The purpose of the reciprocal arrangement is to prevent homelessness for women fleeing domestic abuse and other forms of VAWG, and ensure that survivors who have a social tenancy can retain it safely. Evidence from the first year of the reciprocal scheme shows that, despite barriers resulting from long waiting times to access social housing, this partnership model can deliver real results in keeping women and children at risk of multiple forms of violence and disadvantage safe.<sup>19</sup> The reciprocal scheme should be considered by MHCLG for implementation beyond London, which would require national and regional coordination.

<sup>18</sup> Standing Together Against Domestic Violence, <http://www.standingtogether.org.uk/local-partnership/housing-and-homelessness> (accessed 30 April 2019)

<sup>19</sup> Safer London, Summary of key learning from year 1 of the Pan-London Housing Reciprocal, 2018.

### *Solihull Council and Solihull Community Housing*

Since the implementation of the Homelessness Reduction Act, Solihull has been working closely with local partners to ensure an effective customer pathway is in place for victims of domestic abuse, as this is regularly in the top three reasons for approaches by homeless households in Solihull. Domestic abuse was the top reason for homelessness applications in 2017/18 (23% of all applications were due to domestic abuse) in the local authority, and in 2018/19 was the second main reason for homelessness amongst those where a prevention or relief duty were accepted due to them being homeless or at risk of homelessness within 56 days (16% of all prevention or relief duty cases).

Solihull operates a Domestic Abuse Priority Group which is a multi-agency partnership group responsible for developing and delivering a domestic abuse strategy. Housing (strategic lead and providers) are represented on this group, with a number of actions in the Domestic Abuse Action plan focused on achieving the objectives of the prevention of domestic abuse, providing accessible and appropriate support for victims, children and young people who are affected by domestic abuse, and working in partnership to obtain the best outcome for victims and their families. This feeds into Solihull's multi-agency Homelessness Forum where the domestic abuse co-ordinator and local service providers are represented.

In terms of housing, Solihull's key actions on this agenda are to:

- Develop an effective pathway for those at risk of homelessness due to abuse, utilising MHCLG funding;
- Consider options locally and regionally to facilitate move on from refuge;
- Maintain the Sanctuary Scheme (which is funded through a homelessness grant following a review of provision);
- Review prevention options and focus these on supporting victims of domestic abuse to remain in their own homes (where it is safe and they wish to do so).

The Council has received funding from MHCLG to pilot a new approach to partnership working. This will establish a targeted support service to support women who are accessing Solihull Community Housing Options as they are at risk of, or have lost their accommodation as a direct consequence of domestic abuse. The 15 month pilot will comprise Birmingham and Solihull Women's Aid providing a dedicated domestic abuse specialist advocate who will align to Solihull Housing Options Team, with learning shared locally and nationally.

### *Future areas of partnership*

There is undoubtedly scope for further partnership working to tackle both domestic abuse and homelessness. Presently around 64% of households own their own homes, hence responses to tackling homelessness should examine the role that mortgage providers and other stakeholders in the privately-owned housing sector can play in terms of security of housing and advocating home retention. Economic abuse can manifest itself in various ways but may include the mortgage being sabotaged by one partner, it might also mean that a victim-survivor is unable to pay for, or physically access a privately-owned property, hence financial institutions must be involved in this work. Currently there is no template or model for partnership working in the UK between banks and other agencies for victims and survivors who may find themselves in one of the scenarios mentioned, however in Australia, some banks have relief funds for women who need to access money in an emergency. Due to the fact that domestic abuse can be so wide reaching and takes many forms, a holistic approach is required to tackle it. We would therefore argue that partnership working should not be limited to the 'obvious' organisations, and utilities providers, mortgage lenders, banks and estate agents are also part of the conversation surrounding domestic abuse, housing and homelessness reduction.

Further, such partnership working can take place alongside legal systems that can prevent homelessness and protect victims and survivors of domestic abuse. The proposed

strengthening of legal mechanisms via the intention to introduce a new Domestic Abuse Protection Notice (DAPN) and Domestic Abuse Protection Order (DAPO) in the draft Domestic Abuse Bill will help facilitate more effective work in the legal sphere with regard to domestic abuse, and, could work alongside the Homelessness Reduction Boards to ensure the legal mechanisms available are utilised to protect women at risk of homelessness as a result of domestic abuse. Currently, Domestic Violence Protection Orders (DVPOs) do not have a criminal sanction if they are breached. By making the breach of a DAPO a criminal offence, strong messages are sent out regarding non-compliance and DAPOs could be utilised to remove a perpetrator from a home. Where an owner-occupied property was purchased under a joint mortgage, engagement with the legal system may be the only way in which victims and survivors can retain their property, therefore discussions surrounding reducing homelessness must recognise the role that legal institutions can (and should) play.

#### **4. Data collection**

We welcome the government's focus on improving data collection and recording in order to develop evidence-based strategies, design service provision and intervention, and evaluate outcomes. Our organisations are concerned that current data collection on homelessness too often 'hides' the experiences of women and recommend that all homelessness data, including rough sleeping counts, include a gender breakdown and are reviewed to ensure accurate reflection of the numbers of homeless and rough sleeping women. An evidence review by the University of York for St Mungo's noted that the predominant 'street count' method of measuring rough sleeping has methodological limitations, and found reason to believe that women may be at greater risk of being missed than men.<sup>20</sup> We therefore recommend that all homelessness data, including rough sleeping counts, include a gender breakdown and are reviewed to ensure accurate reflection of the numbers of homeless and rough sleeping women.

Government plans to introduce data pilots offer clear scope to improve the data on women's rough sleeping, drawing on international best practice. The York review found that a multiple data point approach like that used in Denmark, including cross sector working, data merging and survey methods, should be explored.<sup>21</sup>

We recommend that government should include a dedicated work stream on recording and measuring women's homelessness as part of the data pilot programme. Government should also investigate how to combine and merge data in new ways to give the most accurate possible picture of women's hidden homelessness and rough sleeping. This work should actively include organisations and data from the domestic abuse sector, where women who avoid male dominated homelessness services may go for help. We also recommend that the data pilots should engage directly with women with lived experience, in order to best understand how and where local women sleep rough and improve data collection.

In addition to gender dis-aggregated homelessness data being required, it would be beneficial if data is collected whereby local authorities ask people if they have had mortgages prior to seeking local authority housing. Looking at the tenure type from which someone is seeking housing support will allow us to ascertain if significant changes in economic circumstances have occurred and whether these may be attributable to economic abuse. This would also service to help alleviate the pressure on social housing where many home-owners are forced to turn.

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<sup>20</sup> <https://www.mungos.org/app/uploads/2018/10/Women-and-Rough-Sleeping-Report-2018.pdf>

<sup>21</sup> <https://www.mungos.org/app/uploads/2018/10/Women-and-Rough-Sleeping-Report-2018.pdf>

## 5. The Domestic Abuse Bill

Our organisations also have a range of practical recommendations on how to improve the housing response to domestic abuse and tackle the drivers of women's homelessness, many of which we would like to see delivered through the government's landmark Domestic Abuse Bill. This includes, but is not limited to:

- An automatic assumption of 'priority need' status for survivors of domestic abuse;
- Equal access to protection and support for women with no recourse to public funds;
- Further emphasis on housing and homelessness within Domestic Homicide Reviews (DHRs);
- Legislative change to improve the situation with joint tenancies and mortgages;
- Change to local connection rules of both the victim and the perpetrator, in particular on leaving prison.

The national group has also been working with MHCLG to look at how changes to social housing regulation through the Consumer Standards can ensure that the housing sector prioritises the response to domestic abuse alongside tackling issues such as anti-social behaviour.

Of critical importance to improving the response to homelessness will be the delivery of an automatic assumption of 'priority need' status for survivors. We strongly welcome the new emphasis that the Homelessness Reduction Act places on prevention, and would expect that as far as possible local authorities would be working with people who have experienced or are at risk of domestic abuse to prevent their homelessness occurring in the first place.

However, homelessness cannot always be prevented, and this is especially true for survivors of domestic abuse who often present at a time when they have fled a dangerous situation and would be putting themselves at risk by returning home. Under the current law, however people without dependent children who have managed to flee an abusive situation are required to pass the vulnerability test to be owed the full homelessness duty, deterring people from leaving abusive and potentially life-threatening situations. Of the 97 women escaping abuse supported by Women's Aid's No Woman Turned Away project in 2017-18 who had approached their local housing team for support, over half (53.6%) were prevented from making a valid homeless application and nearly one quarter (23.1%) were told they were not a priority need despite having multiple vulnerabilities<sup>22</sup>.

If people do manage to flee abuse, many will be left facing homelessness if they are unable to pass the vulnerability test, the threshold for which can be very high and open to differing interpretations by local authorities in England. There is also evidence of local authorities using the vulnerability test as a gatekeeping tool. Extending automatic 'priority need' to all survivors, and align with legislation in Scotland and Wales, will remove the requirement to prove vulnerability and ensure a uniform approach for supporting survivors escaping abuse across the country. This change could be delivered through the draft Domestic Abuse Bill through an amendment to the Housing Act (1996). It should also help to change the culture around how survivors are treated when they approach Housing Options teams, as well as ensure greater consistency between local authorities in the offer provided. The importance of this should also be made clear in guidance to local authorities and enhanced training for Housing Options officers.

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<sup>22</sup> Women's Aid, Nowhere To Turn: Findings from the Second Year of the No Woman Turned Away Project. Women's Aid, 2018.