

Improving the move-on pathway for survivors in refuge services

A recommendations report

| Α. | Introduction | P1 |
|----|---------------------------------|-----------|
| в. | National context | P2 |
| С. | Current arrangements | P3 |
| D. | Feedback on a national solution | P7 |
| Ε. | Wider challenges and barriers | P8 |
| F. | Conclusions and recommendations | P10 |

A. INTRODUCTION

In May 2020 Women's Aid Federation of England (WAFE), the Domestic Abuse Housing Alliance (DAHA), National Housing Federation and Chartered Institute of Housing launched a 'Call to Action' on move-on. This was a short-term response to the COVID 19 crisis, driven by the fact that changes to nominations and lettings procedures in the early months of the pandemic meant that housing providers had more empty properties than usual. The Call to Action encouraged housing associations to prioritise survivors ready to move-on from refuge, and demonstrated the commitment that many in this sector have to re-housing survivors when they have properties available.

WAFE and DAHA secured funding from the Home Office to investigate whether there is a need for a national mechanism to 'link up' refuge services and housing providers to improve the move-on process and, if so, how it would work. Our organisations held a series of workshops to consider: current arrangements for rehousing survivors, the barriers and challenges to doing this, and how effectively the proposed solution would work. These included:

- WAFE facilitating workshops with nine member organisations, delivering refuge services from a range of regions across England. There were a range of types of service providers which varied in size and included commissioned services, non-commissioned services and specialist services led 'by and for' Black and minoritised women.
- DAHA facilitating workshops with twenty six housing providers –including 1 membership body, 11 housing associations and 5 local authorities across England.

This report draws together the findings from these workshops with national data on refuge provision and move-on, and makes conclusions and recommendations on how best to improve move-on from refuges. We have anonymised the providers, referring to them by the region in which they are operating in.

B. NATIONAL CONTEXT

Ensuring women and children can 'move on' from refuges is essential for supporting long-term recovery and independence, and ensuring that women who need the safe accommodation and specialist support provided within these life-saving services can continue to access it. Demand for the life-saving national network of refuge services in England continues to exceed supply. There is a 30% shortfall in the number of refuge spaces required and 64% of total referrals to refuges were turned away in 2018-19.

In addition to the lack of available spaces, refuge providers face significant challenges in resettling women and their children who are ready to leave their service. A previously largely consistent pathway from refuge into secure – often social – housing has been undermined by the lack of available social housing, unaffordable other forms of housing and the impact of welfare benefit changes. The result is that women and children will now commonly leave refuges and move into another form of temporary, move-on or second stage accommodation. The challenges with 'move-on' mean that women and children ready to leave refuges are not able to, blocking spaces for survivors who need to escape (bed blocking) and compounding the overall availability of spaces.

Women who aren't eligible for social housing, or who face barriers to accessing the accommodation they need, often spend far longer in refuges than they need to or want to. Whilst on average a refuge space in England becomes available on Routes to Support¹ every four months, the length of stay for women with insecure immigration status, for example, can take up to 12 months or longer.

Move-on became an increasing problem during the early months of the COVID 19 pandemic. The 'moratorium' on moving during the full lockdown period meant that the process of resettlement became even more challenging and, anecdotally, local domestic abuse services were reporting that move-on during this time completely stopped.

WAFE found that during the full lockdown period (from 23rd March to 31st May 2020) there was a significant reduction in the number of vacancies posted by refuge services to the Routes to Support database. In total, refuge services in England posted 1,281 vacancies during the full lockdown period – a 40.6% decrease from the same period in 2019. The reasons for decreased availability varied, including: being unable to accept new referrals due to staffing capacity; having to reduce the number of families in the refuge to meet government guidance; concerns over managing the spread of the virus in communal accommodation. However it is clear that issues with move-on were a key factor - 57% of the providers responding to WAFE's survey in June 2020 told us that there were women ready and waiting to move on from their refuge, and for 43% of providers over one third of their current residents were in this situation.

Table 1 shows the numbers of women moving-on from refuge (as opposed to a vacancies being added for another reason) in England in the period April – September 2020 and the estimated number for the same period in 2019. WAFE only started to collect this data from 1st April 2020, but has been doing so in London since 2014. We have therefore used estimates based on information received since April to estimate the proportion of vacancies added as a result of women moving on for regions outside London. As we have more data for London we are able to more accurately assess the impact of COVID 19 on move-on in the capital – and have found a 6% drop in the period April to September 2020 compared to the same period in 2019.

¹ <u>Routes to Support</u> is the UK-Wide directory of violence against women and girls services, run in partnership by Women's Aid Federation of England, Women's Aid Federation of Northern Ireland, Scottish Women's Aid and Welsh Women's Aid

We would estimate the number of women moving on from refuge during a six month period at between 3,000 and 4,000.

| | April | May | June | July | August | September | Total |
|-----------------------------|-------|------|------|------|--------|-----------|-------|
| 2020 move on | 454 | 392 | 468 | 533 | 505 | 624 | 2,976 |
| Estimated 2019 ² | 696 | 689 | 606 | 752 | 713 | 727 | 4,182 |
| % change | -35% | -43% | -23% | -29% | -29% | -14% | -29% |

Table 1: women moving on from refuge during a six month period from April to September

C. CURRENT ARRANGEMENTS

Both workshops with refuge and housing providers showed clearly that there is a wide range of approaches to move-on across the country. Refuge providers currently face significant inconsistencies in arrangements between the local authorities that they operate or are seeking to rehouse women in.

We identified four main pathways for move-on from refuge services, but found significant variation within them:

1. Second stage accommodation

In some areas there are specific 'second stage' accommodation arrangements – which provides longer-term accommodation, often for up to two years, for survivors leaving refuge. It can be provided in a range of different types of accommodation- including groups of flats, or single rooms with shared kitchens, and dispersed move-on houses. The support provided can vary dependent on the women's individual circumstances and needs.

These units of accommodation may be owned by the same housing provider who also own local refuge buildings. The support and housing management will also likely be delivered by the same domestic abuse service across all these accommodation settings. This arrangement can facilitate a quicker move on from refuge into second stage and offer ongoing support between tenancies from a trusted and expert domestic abuse worker. The process of establishing a partnership and business model between a registered provider and domestic abuse service can be lengthy, in particular when negotiating conditions for ensuring a 'sustainable tenancy' and liability for arrears and voids. The short-term funding of domestic abuse services was also at odds with the Housing Regulators requirements for such building requirements.

One refuge provider in the North West (NW) told us that they are part of a partnership of four specialist services who provide refuge across the county, which coverts ten local authority areas. The approach to move-on varies significantly across these authorities, but in some places positive arrangements were in place. This had included working closely with a housing provider to establish second stage accommodation which were connected to their refuges, which provided women and children ready to move-on with more independence. Families could use these properties whilst they have an active application for longer-term housing. Another local authority had recently funded them to run 18 flats as move-on accommodation to cope with the challenges caused by COVID 19, which would be in place for a year.

² Actual figures for London. Estimates for other regions based on the percentage of vacancies added in 2020 which were attributed to a woman moving on applied to the number of vacancies added

The Greater London Authority (for London) and Homes England (for the rest of the country) Move On Fund - which offers capital grants to support the development of second-stage accommodation, alongside revenue funding for on-going tenancy support – was also highlighted in the workshops as an opportunity to increase provision of this form of move-on accommodation. Whilst there have been concerns raised about the feasibility of specialist refuge providers being able to bid for this funding, as Registered Provider (RP) status is required, there were some examples of refuge and housing providers working together to access it. This included a specialist service led 'by and for' Black and minoritised women in the North East (NE) working with a housing provider to secure Homes England funding, which would provide ring-fenced move-on housing for Black and minoritised women ready to leave their refuge. It was described as an important way to provide a 'bridge' between refuge and fully independent living, which was particularly important for providing Black and minoritised women facing additional barriers with continued advocacy and support.

2. Direct lets/offers to women leaving refuge

Some refuge and housing providers we spoke to talked about established arrangements where direct housing lets are offered to women requiring move-on from refuge services, either from local authorities but most commonly from housing associations. Where these arrangements were in place, there was generally positive feedback – as they were often underpinned by a supportive working relationship between refuge and housing providers. One refuge provider in the South East (SE) had recently worked with their local authority to establish 'long term temporary accommodation', with 5-10 year leases on properties, which women and children ready to leave refuge were offered. This was described as a significant improvement from leaving women on the 'waiting list' in the local authorities letting scheme.

However, direct lets seemed to be rare - largely because nominations agreements³ between local authorities and RP is approved by the local authority therefore impacting the lettings activity of an RP in a local area. The number of properties that the local authority is entitled to through nominations agreements varies between areas – in the group of providers that DAHA spoke to, the percentage of properties given to the local authority ranged from 100% to 0%, with the most common being 75%. The nominations agreement impacts on whether, and how many, direct lets can be made to survivors who need to move-on from refuge.

In one local authority in the West Midlands (WM), a WAFE member service was running refuge services where support costs are funded by the local authority and those that were not. Women and children in the commissioned refuge service were able to access direct offers from the local authority and, if these weren't suitable, they would go through the local choice based lettings system. But families in the non-commissioned refuge services, and presumably those living in other refuge services provided by different organisations were not able to access this pathway.

RPs did indicate that even with nominations agreements that gave them flexibility over a proportion of properties for their own use, there were a number of pressures which restricted their ability to provide direct lets to survivors. For example, they may need to use the direct lets they have for internal management transfers and reciprocal agreements, and there have previously been calls to prioritise refugees and individuals leaving Housing First schemes.

³ An agreement between the Council and the Registered Provider (RP) by which the occupation of the Affordable Housing Units is approved by the Council and therefore affects the letting activity of a RP in that local authority.

Whilst COVID 19 had compounded many problems, in some areas it had to positive change in delivering direct lets. One refuge provider highlighted that, in a local authority in Yorkshire and Humberside (Y&H), an emergency housing panel was established in June 2020 which enabled supported housing providers (such as refuge services) to send in applications for consideration so they could match clients to vacant properties. The panel also put together an essential housing package – to compensate lack of options and speed required to move out - which included a bed for each room, kettle, and microwave. The panel worked effectively, but was only temporary. In some other local authority areas, housing associations had offered properties directly to refuge providers during COVID 19.

3. Local choice based lettings systems

Local choice based lettings systems, which enable people on the council's housing list to bid for council and housing association properties, seemed to be the most common move-on pathway. We found significant variation in how lettings systems worked to support survivors who need to move-on from refuge services.

Local authority housing allocation policies determine 'who has priority' within these letting systems. Survivors of domestic abuse who are leaving a refuge are considered homeless as defined in Part 7 of the Housing Act 1996 and will be owed a duty if they meet the relevant criteria.

Local authority housing allocation policies determine 'who has priority' within allocation schemes. Every housing allocation scheme must be drawn up so as to secure that reasonable preference is given to the five categories of applicant set out in the <u>Housing Act 1996 section 167(2)</u> [as amended] – including people who are homeless and people who need to move on medical and welfare grounds. Local authorities can also give 'additional preference' to particular groups of people who have a reasonable preference, if they have urgent housing needs - including if they are homeless as a result of violence or threats of violence.

In November 2018 MHCLG issued new statutory guidance to 'strongly encourage all local authorities to apply the medical and welfare reasonable preference category to victims and their families who have escaped abuse and are being accommodated in a refuge or other temporary accommodation'⁴. Although women and children leaving a refuge should always therefore given both reasonable and additional preference within allocations schemes, we found that current guidance is inconsistently applied. It appears that not all local authorities would consider a survivor leaving a refuge as requiring reasonable and additional preference on the grounds that they are homeless as a result of violence. Our focus groups demonstrated that practice varies significantly across the country:

- In one local authority in the WM it takes for 9-10 months for women living in refuge to even get a code which enables them to start bidding for properties
- One local authority in the NE, who held 100% nomination agreements with the RPs in the area, consistently giving women in refuge 'band 1' priority which was described as a positive arrangement.
- But another local authority in the NE with a 56 day delay on applications to the waiting list, which meant that the provider needed to register women very early on arrival at the refuge in order for her to even start the process which was then subject to further delay.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment data/file/753667/Improving access to social ______housing for victims of domestic abuse.pdf

- A waiting list of up to five years for social housing tenancies in the SE, which didn't consistently categorise women leaving refuge as band 'A' or 'B' unless they had other vulnerabilities such as disabilities or children.
- One local authority in the NW who 'won't consider it domestic abuse', and enable women to be on priority banding for housing applications, unless she has been in the refuge for 12 weeks.
- A London borough who did not give allocate more points to women in refuge on the register, but always give them reasonable preference for housing whist they were living in the refuge.
- A housing provider in the NW who had an in-house domestic abuse team, who oversees move on needs from their local refuge helping to ensure that properties offered are in safe location and providing support to survivors bidding on properties.

4. Private rented sector

There were very few mentions of the private rented sector (PRS) as a suitable move-on pathway for survivors leaving refuge, reflecting the significant economic barriers that women and children escaping domestic abuse face in accessing a tenancy in the PRS.

Whilst one refuge provider in the East Midlands (EM) stated they support survivors to access the PRS if they wished to, others highlighted that: the private rented route is not affordable within the local authorities they are operating in, particularly within the Local Housing Allowance (LHA) rates of housing benefit; PRS accommodation may be insecure or lack the ongoing support that survivors leaving refuges need; and that the supply of PRS tenancies in their areas are becoming increasingly unavailable at all.

Enablers

Whilst the inconsistency of current arrangements – and the challenges this presented – was our key finding, feedback from refuge and housing providers also highlighted a number of enablers for successful move-on:

- Clear local authority allocation schemes which ensure survivors are consistently prioritised for all pathways in place in the local area, including through direct lets and local choice based lettings schemes. The workshops identified that clear and consistent allocation schemes were essential for a swift and robust move-on pathway from refuge.
- Training and accreditation for housing providers to ensure that they are delivering safe and effective response to survivors. Specifically, we heard that undertaking DAHA accreditation⁵ had helped an RP in the NW review the offer and pathway for survivors leaving refuge – and ensured they removed unintended barriers to resettlement. The local specialist service had highlighted that they'd seen significant progress in the understanding and practice of the RP to survivors after they'd undertaken DAHA accreditation.
- Partnerships and positive relationships between specialist domestic abuse services and local authorities and housing associations were also identified as delivering real change and effective move-on pathways. One refuge provider in the WM described that whilst the lettings system posed a number of challenges, their work to deliver 'prevention and relief' duties under the

⁵ DAHA was founded 2014 and is a partnership between housing associations Gentoo and Peabody and a domestic abuse charity Standing Together. The Domestic Abuse Housing Alliance's (DAHA) mission is to improve the housing sector's response to domestic abuse through the introduction and adoption of an established set of standards and an accreditation process.

Homelessness Reduction Act for their local authority enabled them to provide more effective support to survivors through this process.

 The need for ongoing support funding with move-on accommodation – as many survivors leaving refuge may face challenges with tenancy sustainment and require continued support. Housing providers pointed to the need to adapt existing models which support tenancy sustainment – such as Housing First and Clearing House – for survivors leaving refuge.

D. FEEDBACK ON A NATIONAL SOLUTION

Our proposal to these inconsistencies is a mechanism that would 'link up' demand for move-on for women and children ready to leave refuge with housing associations who have 'direct let' vacancies; to ensure the process is swift and simple. We suggested this would require a database where refuge providers could enter anonymous information: family size; accessibility requirements; location preference, which would be shared with housing providers so they could identify suitable vacancies for families requiring move-on. This mechanism would not seek to impact good local arrangements and working relationships, but would benefit areas where there are currently inconsistent and complex arrangements.

In response to this, refuge providers were supportive – stating that such a mechanism would be helpful in tackling some of the challenges with move-on. Housing providers were also welcoming of the need to exchange information and agreed that a national platform would be helpful. One provider specifically mentioned existing systems – such as Routes to Support and On Track⁶ – as a basis for this, however there was a broader consensus on the importance of ensuring compatibility between databases. There were further points about practicalities that would need to be considered, such as who would be updating the database, and deciding on the most appropriate lead within RPs to be able to access the information. An example of a similar database within social services for young people with learning disabilities was highlighted, as well the importance of gathering learnings from existing examples.

Refuge providers highlighted the importance of data protection and privacy, and the need for safeguards or a dedicated space for this if undertaken within an existing database. However services were clear that our proposed mechanism would aid monitoring of national move-on demand and improve the response. Both workshops agreed this work would benefit from the support of national commitment or a campaign, similar to the Make A Stand⁷ pledge, and leadership. Housing providers highlighted the leadership and commitment behind ending street homelessness, particularly within the global pandemic, and the need for national recognition of the link between domestic abuse and all forms of homelessness.

The main concern raised was the possibility of the mechanism being misused or manipulated, for example if signposting to it was deemed sufficient to meet local authorities' relief duties. This example of gatekeeping points to the wider challenges and barriers that need addressing to ensure women and children who have experienced domestic abuse are able to find long-term housing.

⁶ On Track is the Women's Aid case management and outcomes monitoring programme.

⁷ <u>http://www.cih.org/makeastand</u>

E. WIDER CHALLENGES AND BARRIERS

Alongside adequate and appropriate move-on housing arrangements, both workshops highlighted a number of other housing reforms also required. We know that domestic abuse, by its very nature, is a housing issue and both workshops identified other key barriers facing women and children:

1. Lack of social housing

Refuge providers in the north and the Midlands generally noted that the majority of women they support move-on into social housing, and housing providers in Manchester highlighted local arrangements which give survivors of domestic abuse priority access to social housing.

However despite government guidance to improve access to social housing for survivors of domestic abuse, elsewhere in the country others highlighted that women are on waiting list for up to five years. We also heard from a SE refuge provider that social housing is not often volunteered as an option at all by local authorities, and if they question about the availability of this they are told it's for disabled people and not for survivors of domestic abuse.

We know that women will often have to move several times after leaving a refuge from different forms of temporary and short-term accommodation, if they are unable to access secure social housing as the private rented sector remains unaffordable and inaccessible for many survivors.

2. Lack of awareness and understanding of domestic abuse

The majority of refuge providers raised concerns around the lack of awareness and understanding of domestic abuse. We heard of judgemental, victim-blaming responses to women: *"aren't homeless"*; *"aren't considered a victim of domestic abuse unless been in a refuge 12 weeks"*, alongside the trauma of re-telling their experience. This not only highlights poor attitudes and a lack of training, but the consequential gatekeeping that Women's Aid have continued to highlight through the No Woman Turned Away Project⁸.

It is essential that the housing sector – both local authorities and housing associations - undertakes specialist training to both improve service provision to women and children experiencing domestic abuse, and to help prevent abuse through conveying strong and unequivocal messages about its unacceptability. Housing providers should be aware that addressing domestic abuse is a priority at a national level, evident through the current Domestic Abuse Bill, and that they have a responsibility to respond in a safe and appropriate way – working with specialist service providers to meet survivors' housing needs.

3. Discrimination

Both housing providers and refuge providers raised concerns about the discrimination that survivors who face additional forms of discrimination or multiple disadvantages, and experience more 'complex needs' as a result, will face in accessing housing. Due to the additional specialist support that women with additional support needs require, both workshops highlighted that these women face severe barriers in accessing housing that meets their needs.

Furthermore, women with additional support needs or who are deemed as having 'anti-social behaviour' may have a 'history' of rent arrears or evictions, which results in further discrimination

⁸ The <u>No Woman Turned Away (NWTA</u>) project has been funded by the Ministry of Housing, Communities and Local Government (MHCLG) since January 2016. It provides dedicated support to women who face barriers in accessing a refuge space. A team of specialist domestic abuse practitioners receive referrals from Women's Aid member services, and we conduct detailed monitoring and analysis of survivors' experiences alongside this.

and rejection from the housing system. This again emphasises the lack of understanding of domestic abuse and the long-term impacts it can have.

Rent arrears and evictions are commonly associated with domestic abuse, often as a direct result of economic abuse at the hands of an abuser - which includes restricting how survivors acquire, use and maintain money and economic resources such as housing, food and transport⁹. Often, survivors cannot be physically safe until they are economically safe. Effective interventions therefore must consider the survivors' economic circumstances and how this affects their ability to access safety and independence from the perpetrator, including housing and tenancy sustainment.

4. Local connection

All refuge providers highlighted the severe barrier that local connection restrictions continue have for survivors. Despite existing guidance¹⁰ stating that those who have fled to a refuge in another local authority area are not disadvantaged by any residency or local connection requirements, we heard that local authorities continue to state that a woman must have a local connection with an area to move in. We know that many survivors escaping abuse need to leave their local authority area in order to be safe, and we have continued to highlight the inconsistency between local authorities across England in meeting their obligations to house women fleeing domestic abuse from another local area.

The feedback from our workshops emphasises that guidance alone is not sufficient to address this issue, and that the opportunity presented by the Domestic Abuse Bill and new duty on local authorities to deliver 'safe accommodation' should be seized to deliver positive change. We recommend that the Bill delivers a statutory bar on local authorities imposing local connection restrictions or 'residency requirements' within homelessness duties and housing allocations for survivors.

5. Lack of cross-agency working

Refuge providers highlighted concerns about the lack of effective cross-agency working, in particular between housing and children's social care. We heard one example of a woman trying to regain custody of her children being put in a one bed property by housing, but social services wouldn't return the children until she lives in a bigger property. In contrast, another woman was told by social services that if she leaves the refuge they will undertake care procedures, leaving the woman no choice but to stay in refuge.

6. Prioritisation

We heard some housing providers prioritise survivors of domestic abuse for move-on, whilst a number highlighted that during the global health pandemic their focus has been on street homelessness. We also heard from a NW provider that their local authority's priority was to not identify any cohort as more a priority than another.

Despite this, housing providers agreed that ensuring local authorities increase their prioritisation of survivors would make the most significant difference. We highlighted it is therefore welcome that, after years of cross-sector campaigning, the Domestic Abuse Bill currently going through Parliament will ensure survivors of domestic abuse will be automatically considered in 'priority need' for

⁹ https://www.dahalliance.org.uk/media/10649/3 -wha-economic-abuse.pdf

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/753667/Improving_access_to_social _housing_for_victims_of_domestic_abuse.pdf

housing. Housing providers added that in addition to this, they would welcome further steps to ensure support networks and other additional needs of survivors are considered in a more sensitive way.

7. White goods

Housing providers agreed that quality of furnishings and white goods are an important consideration, particularly as not having white goods in place resulted in a greater likelihood that the survivor would return to the perpetrator. Economic abuse often leaves women with little or no money when they leave the perpetrator. Therefore, the prospect of having to buy essential, but expensive, white goods can be daunting and seem unfeasible, particularly if a woman has children.

Registered providers build their homes according to the Decent Homes standard, which doesn't currently include white goods, furnishing or decorating needs. Some housing providers did include white goods, funded through local welfare provision but this option wasn't available consistently. Exemplary models considered holistic set of safety and support needs for sustaining a tenancy and also included <u>Sanctuary Scheme¹¹</u> provision and personalised budgets like <u>Flexible Funding¹²</u> to enable access to stable housing as quickly as possible.

A NW provider emphasised that their arrangement involved providing white goods and sanctuary scheme measures, as well as decorations and providing further support. This good practice is welcome, however it was clear that funding options for offering this service is currently limited and sometimes at the expense of the provider.

8. No recourse to public funds (NRPF)

A number of refuge providers highlighted the severe barrier that NRPF conditions pose for survivors accessing housing due to their lack of access to welfare benefits. We heard from housing providers in the NW and nationally who are undertaking mitigated risks to house survivors with NRPF, in the acknowledgement that funding for rent may be delayed or not paid in full.

However a NE refuge provider emphasised that even for women on the destitute domestic violence concession (DDVC), who are eligible for indefinite leave to remain (ILR) through the domestic violence concession (DVR), rehousing can take up to nine to 12 months. They were also concerns that properties are also often unsuitable, and in locations or communities where migrant women or women with insecure immigration status would face racism and would have no access to support.

A London housing provider urged for survivors' immigration status to be separate from their housing and homelessness status, and the support they required. Refuge providers referenced the work of the Step Up Migrant Women Campaign¹³ in relation to improving the Domestic Abuse Bill for migrant women, and the benefit this would have in terms of supporting them with suitable housing.

F. CONCLUSIONS AND RECOMMENDATIONS

There is currently no consistent pathway from refuge into secure housing, and the challenges with 'move-on' mean that women and children ready to leave refuges are not able to, blocking spaces for survivors who need to escape and compounding the overall availability of spaces. Even within the

¹¹ https://www.dahalliance.org.uk/media/10661/15 -wha-sanctuary-scheme.pdf

¹² https://www.dahalliance.org.uk/media/10657/11 -wha-flexible-funding.pdf

¹³ <u>#StepUpMigrantWomen</u> is a campaign led by the Latin American Women's Rights Service (LAWRS) and supported by more than 50 organisations standing together for migrant women's rights.

pathways that do exist, there remain severe inconsistencies in local arrangements and wider barriers and challenges that survivors, services and housing providers face.

Therefore there is both a need and support, which we have demonstrated, for our proposed national mechanism to 'link up' demand for move-on for women and children ready to leave refuge with housing associations who have 'direct let' vacancies. There is further work needed to ensure this approach works for all partners, but also a broader programme of changes to address wider barriers to rehousing faced by survivors. The government's Domestic Abuse Bill is a key opportunity for this. A number of our recommendations below would support government efforts, both for provisions within the legislation but also within the accompanying statutory guidance - which recognises the work of DAHA and the importance of the Whole Housing Approach¹⁴.

Recommendations

National mechanism

Further work is required to develop the national mechanism, using lessons from existing models. Development work would need to determine, for example, the criteria and policies for RPs involved and the resourcing and administration of the database. Further resources are required to enable specialist domestic abuse and housing organisations to develop and deliver this.

To support this, we also recommend a national campaign to embed the commitment and support for ensuring women and children experiencing domestic abuse are able to move-on into safe and appropriate accommodation. The Make A Stand pledge provided an important first step in ensuring housing provides made an initial commitment to supporting people experiencing domestic abuse within their organisations. It is vital that these efforts and this momentum is built on, and why a further campaign is needed to ensure good internal practice translates in to external policies and procedures, including move-on.

Our recommendations:

- Further resource is delivered to enable specialist domestic abuse and housing organisations to establish a national move-on mechanism.
- A national campaign building on the commitment and support gained through the Make A Stand pledge.

"Move-on hub" pilot

Leadership at both national and local level, is crucial for ensuring local allocation schemes are consistent, and effective in enabling move-on from refuge. Our workshops identified that specialist domestic abuse organisations and housing providers – as well as the Housing Regulator and other agencies - are operating with different motivations in this area, and further work is required to develop an effective model that works. We therefore recommend that that a pilot project is established, within a Whole Housing Approach framework, for a "move-on hub" within at least two cross-border local authorities. This hub, alongside our proposed national mechanism, would support the establishment of new or existing pathways to facilitate move on from refuge, and ensure that ongoing revenue funding is delivered for support services that ensure tenancy sustainment.

¹⁴ The Whole Housing Approach (WHA) aims to improve housing outcomes for victim/survivors by working to understand the barriers across the three main tenure types (social, private rented and privately owned). It coordinates existing options and initiatives and introduces new and innovative ones to address gaps. Domestic abuse services are central to an effective WHA partnership and project delivery.

Crucially, it would develop a workable business model that addresses context, priorities and operations of the range of different stakeholders working to support move-on for survivors.

Our recommendation:

• Provide resources to pilot a 'move-on hub' for survivors of domestic abuse, which will facilitate pathways to move-on and establish a workable business model that enables specialist domestic abuse services and housing providers to deliver both move-on housing and ongoing support.

Recommendations for RPs

We know that housing models which include an allocation specification have been successful. Therefore to support our proposed national mechanism, we recommend that RPs build into their processes a means for allocating direct lets for women and children experiencing domestic abuse, based on how much stock they have and the need identified through the mechanism. Local authority nominations agreements would need to be flexible and adjusted to accommodation this. There should also be a specific consideration given to survivors with NRPF in recognition of the insurmountable barriers they face to accessing housing. Whilst reforms to the DDVC and DVC are required to ensure that survivors with NRPF are able to access housing¹⁵, we urge for RPs to work with specialist service providers to deliver short-term funding that will cover the costs of rent in these cases.

There is also an urgent need to improve the understanding and awareness of domestic abuse in RPs. Following the publication of the Social Housing White Paper¹⁶, we welcome the government's expectation on the Social Housing Regulator to include domestic abuse within the consumer standards. It will be important for there to be ongoing consultation with specialist domestic abuse organisations on how policies will work in practice, and a focus on the need for training and partnership working on move-on, for which DAHA can provide a framework to support RPs.

Our recommendations:

- Registered providers build into their processes a means for allocating direct lets for moveon from refuges through the national mechanism, with specific consideration of those who have insecure immigration status.
- Ongoing consultation with specialist domestic abuse organisations on the inclusion of domestic abuse within the Social Housing Regulator's consumer standards.

Recommendations for local authorities

Our workshops highlighted the variation and pressures on nomination agreements. We therefore urge local government to ensure that local consideration and clarity on the flexibility of nominations agreements policies in order to facilitate more direct letting arrangements for survivors of domestic abuse, and enable RPs to deliver the recommendations above.

Our recommendation:

• Local authorities ensure nominations agreements are flexible, to facilitate direct letting arrangements for survivors.

¹⁵ https://southallblacksisters.org.uk/news/protection-for-all-domestic-abuse-bill-and-migrant-women/

¹⁶ <u>https://www.gov.uk/government/publications/the-charter-for-social-housing-residents-social-housing-white-paper/the-charter-for-social-housing-residents-social-housing-white-paper</u>

Recommendations for government

Our workshops clearly demonstrated the need for legislative reform. It was clear that amendments to statutory guidance to try to improve the consistency of move-on from refuge have not been effective at local level, and further changes are required to ensure survivors leaving refuge are always given 'reasonable preference' in allocations schemes.

There are also wider barriers that government must tackle. The statutory duty on local authorities to fund support in safe accommodation within the Domestic Abuse Bill is welcome, and it will be vital that expected time-frames for move-on are clearly stated to partners to support these efforts. It is also vital that within this legislation, the government introduce a statutory bar on local authorities imposing local restrictions on survivors escaping domestic abuse to sit alongside the statutory duty. Finally, ensuring full and equal protection and support for migrant survivors is an urgent priority for the Bill. All survivors of domestic abuse must be able to equally access housing, support, welfare benefits and legal tools that provide protection from abuse, without discrimination on any grounds.

Our recommendations:

- The Code of Guidance, accompanying the Housing Act 1996, be updated to state that refuge accommodation is included within the definition of 'homeless' and therefore a homeless reasonable preference category should be awarded to those living in refuge.
- Ensure the Domestic Abuse Bill addresses the wider housing barriers survivors' face, by delivering the following legislative changes:
 - Deliver legal clarity that survivors leaving refuge have reasonable and additional preference within local allocation schemes;
 - A ban on local connection restrictions or 'residency requirements' for survivors within homelessness duties and housing allocations, and when accessing refuges;
 - Expand eligibility for the DVR and DDVC to all migrant women.