

Consultation response: Improving Access to Social Housing for Victims of Domestic Abuse

Caritas Social Action Network (CSAN) is the social action agency of the Catholic Church in England and Wales. We represent a network of 41 Catholic charities and diocesan agencies who work for the most vulnerable in our society. This submission was prepared based on feedback from those CSAN member charities who provide domestic violence and abuse (DVA) victims with housing advice, as well as spiritual, pastoral or material support.

These member charities support in principle the intentions of the proposals, in that they seek to make the re-housing of domestic violence and abuse victims smoother.

However, respondents cited two major concerns:

- **Implementing the proposed guidance will be extremely difficult for local authorities without the adequate provision of the necessary resources.**
- **The proposals are an inadequate response to the reduction in funding for refuges for DVA victims.** The role of the refuge for victims is vital and the language and aims of these proposals risk minimising the significance of the refuge.

Below we have elaborated on these points in relation to the three proposals with the consultation:

1. Qualification for social housing (residency tests)
2. Priority for social housing
3. Supporting victims in their existing homes

1. Do you agree with the proposal to use statutory guidance to recommend the exemption of victims of domestic abuse housed in refuges, and other forms of safe temporary accommodation, from any residency requirement?

1.1 DVA victims should be exempt from residency tests, as they often have to move away from the perpetrator to a different area.

However, the Government proposes that the guidance 'strongly encourage' local authorities to exempt DVA victims from their residency requirements, whereas our members believe that it would be more effective make this a statutory requirement.

1.2 CSAN charities are concerned that if local authorities have discretion around this issue, there will be those that will still apply the residency test due to pressure on services.

In effect, this will mean there will be no refuge services in those local authority areas where residency tests still apply, because refuges seek to re-house victims of domestic abuse in the area where they provide support and services.

2. Views are sought on the advantages and disadvantages of this proposal to apply the ‘medical and welfare’ and the homelessness reasonable preference categories to victims of domestic abuse who are living in refuges.

2.1 DVA victims should have their own reasonable preference category. DVA victims who have left their previous accommodation to escape abuse are essentially homeless, but their situation is not comparable to those facing homelessness for other reasons - their lives are at risk. It is for this reason that refuges for DVA victims are so vital.

2.3 CSAN member charities are concerned that grouping DVA victims together with others in temporary accommodation would be dismissing the life-saving nature of a refuge. It is not a homeless hostel, it is somewhere where lives are saved because they are in danger.

2.3 Whilst any proposal to make the transition from refuge to independent housing smoother is welcome, **support services for female DVA victims must not focus on social housing at the expense of the refuge.** The refuge is the key part of the system and cannot be removed from the equation.

CSAN members stressed that in the current context, they are concerned not about continued need, but an increased need due to funding pressures. Councils have reduced their spending on refuges by 24% since 2010.¹

As a result, significant numbers of women’s refuges have been obliged to reduce services or close. According to the Women’s Aid Annual Survey 2016, one in four referrals to refuge services in 2015/16 were declined due to lack of capacity, and over a third of respondents reported that they were already running an area of their service without dedicated funding in 2015/16.²

¹ This figure is from research carried out by the Bureau of Investigative Journalism using council and police data, and interviews with refuge managers and women fleeing domestic violence. The research also highlighted geographical disparities in funding: 50 local authorities received nothing of a [£20 million fund for victims of domestic abuse announced by DCLG in 2016](#), and the amount per head of population varies even in funded areas, from the equivalent of £3.52 per adult woman in Cumbria, to 11p in Kent. Bureau of Investigative Journalism (2017); [No Refuge](#)

² Women’s Aid (March 2017); [Women’s Aid Annual Survey 2016](#)

Housing benefit and its equivalent under Universal Credit currently provides a significant amount of refuge funding: in England for example, housing benefit provides on average 89% of a refuge's weekly housing costs and 53% of total yearly income.³ Combined with the cuts mentioned above, if this funding were to be diverted as a result of increased focus on moving DVA victims into social housing as quickly as possible, more refuges would face closure or would have to reduce the number of places they have.

Any changes to the system which could justify the reduction in funding for refuges and lead to less support are indefensible. **CSAN member charities are concerned that these proposals might form part of preparations to remove refuge provision from the welfare system.**

2.4 CSAN members also suggested that amending local authority guidance is an opportunity to think more broadly in terms of supporting women to exit prostitution. The definition of domestic violence is narrow and **extending the provision of this prioritisation to women who are victims of sexual violence and exploitation too would be beneficial.**

A woman who is fleeing a brothel is in the same situation as a woman who is fleeing domestic violence, because they are fleeing violent abusers in the place where they stay.

2.5 However, making DVA victims a priority is neither practical nor desirable if there is insufficient social housing or housing support.

CSAN cannot universally endorse proposals to prioritise victims of domestic abuse given the large numbers of other vulnerable people – this is meaningless unless there is more supply, to avoid 'de-prioritising' other groups.

3. Do you agree that the guidance should encourage local authorities to use their existing powers to support their tenants who are the victim of abuse to stay in their homes if they wish to do so?

3.1 In the experience of CSAN members, **it is rarely appropriate for DVA victims to remain in the home they shared with the perpetrator.** Where victims do wish to remain, local authorities should be encouraged to do this.

As before, members recommended that a statutory requirement should be placed on local authorities to guarantee this for the minority of victims who wish to evict their perpetrator and remain.

3.2 However, as it is cheaper to re-house a perpetrator than a family, shortages of alternative housing may lead to DVA victims facing pressure to remain in their home. This is dangerous and must be avoided.

³ Women's Aid (2017); [Briefing on Supported Housing Reforms](#), p.1

3.3 In addition, our members highlighted **situations where the DVA victim is not on the tenancy.**

They have had cases of female DVA victims who had been living with an abusive individual for several years in the perpetrator's social housing. **This has meant that when they leave they cannot prove that they were living in social housing previously**, especially if they do not have children who they can show attend a local school. Our member charities have found they must step in to help these DVA victims show that they have recourse to housing support, as at that point they are treated simply as a single woman, beginning at the back of the queue with a fresh application for social housing.

In our members' experience, **this situation has come about more often with female DVA victims from black and ethnic minority groups**, where it is sometimes the cultural norm that the bank account and all official documents are in the male partner's name.

3.4 They expressed frustration around the difficulties in providing evidence of DVA, especially for those victims whose abusers hold their identification documents, and they are therefore obliged to flee without any documents. **They recommend a presumption of belief until proven otherwise in alleged cases of domestic violence**, to avoid immediate demands for police reports or evidence of injury in order to access services, including housing, as DVA victims.

CSAN members commended the recent changes to the NCA's National Referral Mechanism (NRM), a framework for identifying victims of human trafficking or modern slavery and ensuring they receive the appropriate support. Women who come forward as victims of human trafficking are now given safe emergency accommodation for a three-day period.

This three-day period gives more time for information to be drawn out and the necessary evidence to substantiate claims of human trafficking to be obtained and verified in a measured, less immediate manner.

CSAN members charities believe this principle of assuming the victim is in danger and providing immediate safety is also appropriate for DVA victims, as they present with the same psychological symptoms as women who are victims of long-term control and exploitation.