

Consultation response

Response to Home Office consultation:

Violence Against Women and Girls (VAWG) strategy 2021-2024: call for evidence

February 2021

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Shelter helps millions of people every year struggling with bad housing or homelessness through our advice, support and legal services. And we campaign to make sure that, one day, no one will have to turn to us for help.

We're here so no one has to fight bad housing or homelessness on their own.

Introduction

We welcome the opportunity to respond to this important consultation on the future Violence Against Women and Girls (VAWG) strategy, including the impact of domestic abuse.

Domestic abuse was already an increasing problem, even before the pandemic. In England and Wales, the police recorded 599,549 domestic abuse-related crimes in the year ending March 2018. This was an increase of 42% from the year ending March 2016.¹

But the pandemic has made everything worse. The coronavirus pandemic has made accessing help to leave violence or abuse in the home even harder. According to a Women's Aid survey published in August 2020, over 90% (91%) of respondents who were experiencing domestic abuse said the Covid-19 pandemic had negatively impacted in at least one way. Of those women living with their abuser during lockdown, 61% said the abuse had worsened. One-fifth (20.3%) of the respondents to the survey said that they had tried to leave during the pandemic but had been unable to access housing or refuge space.²

Domestic abuse is, by its very nature, a housing issue, as well as a criminal one, because domestic abuse and other forms of violence against women and girls (VAWG) typically occur within the home. 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.³

So, the response from the public and private housing, and homelessness, sectors is crucial in delivering an effective response and support. Lack of access to safe, secure housing is a major barrier to escaping abuse and features strongly in a survivors' decision-making about whether they stay with, or leave, an abuser. If survivors cannot find another suitable home (e.g. because they cannot afford it alone), they can be at risk of homelessness. Survivors can be confronted with the 'option' of facing homelessness and housing insecurity or having to return to a perpetrator.

At Shelter we work with women fleeing domestic abuse who face homelessness due to barriers in accessing a place they feel comfortable, safe and free from harm. **We also know that these experiences have not always been talked about in wider debates in housing and homelessness, let alone heard or acted upon.**

Access to safe housing options for survivors of domestic abuse is absolutely essential for successfully supporting survivors. Along with the rest of the sector⁴, we have been calling for a 'whole housing approach' to ensure that no survivor is faced with such a devastating choice. A 'whole housing' approach would tackle the interconnected issues of housing, homelessness and domestic abuse, and violence against women and girls, in a consistent, joined up way. It aims to improve the response of the housing sector to domestic abuse and deliver a full suite of safe housing options to survivors (including remaining in owner-occupation, renting in the private or social sectors – including via Housing First, supported hostel accommodation, or remaining in the original home as part of a sanctuary schemes).

As well as devastating lives, the impact of domestic abuse is costly to the state. The Home Office estimated 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

¹This in part reflects police forces improving their identification and recording of domestic abuse incidents as crimes and an increased willingness by victims to come forward. Office for National Statistics November 2018 Domestic abuse in England and Wales: year ending March 2018.

² <https://www.womensaid.org.uk/a-perfect-storm-the-impact-of-the-covid-19-pandemic-on-domestic-abuse-survivors-and-the-services-supporting-them/>

³ 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.

⁴ [Domestic Abuse Housing Alliance](#) (DAHA)

maintenance.⁵ It is pertinent we ensure that the response is effective to minimise the impact both on survivors and the state.

With the proven higher risk of domestic abuse, now more than ever survivors need urgent access to **alternative housing that is affordable to them**. Currently, in the absence of enough social homes, the benefit cap acts as a huge financial barrier to someone being able to access a privately rented home, or indeed for local homelessness services to procure affordable accommodation. While the Chancellor announced in March 2020 that the Local Housing Allowance (LHA), or housing benefit for those renting privately, was to be restored to cover the bottom 30% of local rents in each area, **without a lifting of the benefit cap many people will not be able to access the full restoration, and this welcome emergency measure will have little effect**.

But this must be **underpinned by specialist refuge provision to deliver specialist support to women and children escaping from life-threatening harm**.

Housing support is one of the cornerstones to supporting survivors of domestic abuse and this response focuses on this. However, **we stand with the domestic abuse sector in expressing our opposition to separating out domestic abuse from the proposed VAWG strategy**. 'Dual strategies' will fragment coordinated action to tackle VAWG directly impacting all women and girls, whose needs are multiple and intersecting. The approach to addressing VAWG should be based on a deep understanding of the diverse lived experience of all women and girls subjected to VAWG and embedded in an equalities and human rights-based approach as consistent with international and regional convention and national laws. The VAWG strategy should be gendered and cover all forms of VAWG as consistent with international conventions, rather than domestic abuse as presented in the 2018 government consultation *Transforming the Response to Domestic Abuse*.⁶ Attached as an appendix are the joint principles for the VAWG Strategy 2021-2024 as drawn up by the VAWG sector which should be taken into account in developing this strategy.

Recommendations:

- The Home Office should work with MHCLG to ensure accommodation services are recognised as a vital part of the support to domestic abuse survivors in the VAWG strategy.
- The Home Office should ensure the VAWG strategy is gendered and covers all forms of VAWG, including domestic abuse, as is consistent with international conventions. It must take into account the joint principles as drawn up by the VAWG sector and attached as an appendix.
- We have proposed investing £12.2 billion in affordable housing over the coming two years to deliver 173,100 affordable homes over and above existing government plans, all of them social rented, and house an extra 77,000 homeless people. This should provide the springboard to long-term investment in social rented housing of £12.8 billion a year to deliver the social rented homes we need to work towards ending our housing emergency.
- The benefit cap should be lifted for at least a year, to ensure that those who desperately need to leave their home can access another that is affordable and suitable to their needs. This would also relieve the pressure on homelessness services through local authorities.

Housing Support

- Housing support for survivors of domestic abuse is absolutely critical. A secure and consistent pathway into a safe, permanent home for survivors must be established as a core objective for support services.

⁵ Oliver, R., Alexander, B., Roe, S. & Wlasny M. (2019) The economic and social costs of domestic abuse. Published online: Home Office

⁶ Imkaan, [Proposal for an Alternative Bill Addressing Violence Against All Women and Girls \(VAWG\)](#), 2018

- The response from public and private landlords and local authority homelessness services is crucial in delivering effective protection. Lack of access to safe, affordable and secure housing is a major barrier to escaping abuse and features strongly in a survivors' decision-making about whether they stay with, or leave, an abuser. If survivors cannot find another suitable home (e.g. because they cannot afford it alone), they can be at risk of homelessness, adding further trauma to that of relationship breakdown and abuse. So, survivors can be confronted with the impossible choice of facing homelessness and housing insecurity, or having to remain with, or return to, a perpetrator.
- A previously largely consistent pathway from specialist domestic abuse refuge into secure - often social - housing has been undermined by the lack of available social housing. We need to deliver 90,000 more social homes per year in order to provide hope for those in greatest difficulty.
- With the proven higher risk of domestic abuse in lockdowns, now more than ever survivors need urgent access to alternative housing that is affordable to them. Specialist domestic abuse services, such as refuge places, are scarce and currently, in the absence of enough social homes, **the benefit cap acts as a huge financial barrier** to someone being able to access a privately rented home, or indeed for local homelessness services to procure affordable accommodation.

The need for specialist domestic abuse accommodation-based support - refuges

- Refuges are distinct from other types of accommodation listed. They don't simply provide somewhere to live but are unique in providing residents with a planned programme of therapeutic and practical support from staff, and peer support from other residents. Support offered by refuge services also includes access to support for children, where needed. Specialist services deliver holistic support in a safe and secure environment, either provide, or work closely alongside, community-based services and deliver unique added value within a multi-agency response to domestic abuse within local areas.
- There have been significant changes to provision of accommodation-based services over the past decade, the result of which is fewer, larger services covering larger geographical areas and an increase in 'generic providers' - those whose core business is not domestic abuse. This combined with the lack of social housing means the service landscape is lacking.
- There are now 158 providers running the 269 refuge services in England. Only two thirds (66%) of all refuge services are run by dedicated providers, with the remaining third run by housing associations, local authorities or other charities with a wider remit.
- It is important that the Government increases access to specialist accommodation options for survivors, rather than an increasing number of generic services, through its VAWG strategy. For example, **women survivors may prefer women-only homelessness accommodation and services**, which offer the flexibility and expertise to meet their often complex needs. Such services play a key role in linking survivors with specialist support, e.g. local domestic abuse community services or helping prepare clients to access a more structured refuge environment.
- Women from Greater Manchester, with lived experience of domestic abuse and housing or homelessness issues contributing to Shelter's ongoing research, **felt there was a severe shortage of women-only provision**, and that addressing this would be hugely beneficial to improve their experiences of securing accommodation where they felt safe, as many women felt uncomfortable in mixed accommodation. Access to a wide range of options can be particularly helpful to women with

additional support needs, or a larger family size, which can pose challenges in communal living, such as refuges.⁷

Move on to a settled home with resettlement support

- Following on from a refuge, a secure and consistent pathway into a safe, permanent home for survivors must be established as a core objective to any VAWG and domestic abuse strategy. A previously largely consistent pathway from specialist domestic abuse refuge into secure - often social - housing has been undermined by the lack of available social housing. The benefit cap also means that the alternative of a private rental is now largely unaffordable. We need to deliver at least 90,000 more social homes a year in order to provide hope for those in greatest difficulty.
- 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. **87% of over 100 women leaving refuges provided by Solace Women's Aid in 2015 were moved into continued temporary accommodation.** Move-on or 'second stage' accommodation is not, however, a permanent solution. The lack of a secure move-on pathway not only results in further significant uncertainty and disruption for survivors and their children, but incurs significant costs in temporary accommodation. In 2018-19, councils spent over £1 billion on temporary accommodation for homeless households.⁸
- There is the additional barrier of the benefit cap within this. For many specialist refuges, women are exempt from the benefit cap whilst living there. However, in other forms of temporary accommodation there is no such exemption. Therefore, many women may be left living in refuge beyond the point at which they are ready to leave because they cannot afford to move on. It causes a situation where, because women are unable to leave the refuge, they inadvertently block up the system meaning other survivors cannot access a refuge place.⁹
- Resettlement support should also be included within the definition of 'specialist, accommodation-based services', as there is a clear need for move-on accommodation, which includes resettlement support. This is a core part of the work of refuges to support survivors to recovery and independence. Resettlement support is more intensive than regular floating support and continues to provide a short-term programme of support to survivors who have moved on from a refuge.
- We recommend the government gives further thought to how best move-on accommodation can be delivered by specialist domestic abuse providers through the development of the VAWG strategy.

The benefit cap and the barrier it creates

- While the Chancellor announced in March 2020 that the Local Housing Allowance (LHA), or housing benefit for those renting privately, was to be restored to cover the bottom 30% of local rents in each area, without also lifting the benefit cap **many people will not have been able to access the full restoration.** The number of households benefit capped more than doubled from February 2020 to August 2020, **rising from 79,000 households in February to 170,000 in August.**¹⁰
- Without a lifting of the cap, young children could be at particular risk of harm from domestic abuse or face homelessness. Lone parent families with young children are disproportionately affected by the cap. **Lone parent families with a child under five are 19 times more likely to be affected by**

⁷ https://england.shelter.org.uk/_data/assets/pdf_file/0003/1855101/Stuck_in_Limbo_V2.pdf

⁸ https://england.shelter.org.uk/_data/assets/pdf_file/0012/1897545/Cashing_in_-_How_a_shortage_of_social_housing_is_fuelling_a_multi-million-pound_temporary_accommodation_sector.pdf

⁹ <https://www.womensaid.org.uk/wp-content/uploads/2019/12/Economics-of-Abuse-Report-2019.pdf>

¹⁰ https://england.shelter.org.uk/_data/assets/pdf_file/0005/2035364/Final_Infographic.pdf

the cap and lone parent families with **a child under two are 21 times more likely to be affected**.¹¹The benefit cap could be subjecting children to traumatising violence.

- Lone parent families are disproportionately impacted by the benefit cap because the two stated ways to avoid the cap is to move into employment or to move to a cheaper property. Moving into work as a lone parent household can be very difficult as they are the only parent having to juggle, potentially expensive childcare, as well as work. The difficulties of moving home can also be compounded as a lone parent household. Moving to a cheaper area could result in the family losing vital family support networks, informal childcare support through other family members or friends and could also mean older children have to move schools, disrupting their education.
- The options for escaping the cap are more limited for lone parent households and many survivors of domestic abuse must take the decision to go from being a coupled family to a lone parent family. This instantly places them in a situation whereby they are more vulnerable to being benefit capped and being unable to afford alternative accommodation. **This can deter survivors of domestic abuse from leaving the abusive relationship simply because they cannot afford to.**
- As stated above, the benefit cap also creates a barrier to move on from domestic abuse refuges and can cause bed blocking. We know that **homeless households in temporary accommodation are four times as likely to be capped than other households**. Many women who do leave refuges have to move to temporary accommodation as the benefit cap means there are very few options that are affordable in the private rented sector. This puts further pressure on local authority budgets which could be prevented if the private rented sector was made more affordable by lifting the cap.
- Currently, this is more important than ever if those impacted by the increasing instances of domestic abuse in lockdown are to be provided with safe, affordable and suitable housing options. **The benefit cap must be lifted in order to minimise the financial barriers those fleeing domestic abuse experience.**

Recommendations:

- The Home Office should work with MHCLG to ensure accommodation services are recognised as a vital part of the support to domestic abuse survivors in the VAWG strategy.
- The Home Office should ensure the VAWG strategy is gendered and covers all forms of VAWG, including domestic abuse, as is consistent with international conventions. It must take into account the joint principles as drawn up by the VAWG sector and attached as an appendix.
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- The benefit cap should be lifted for at least a year to ensure that those who desperately need to leave their home can access another that is affordable and suitable to their needs. This would also relieve the pressure on homelessness services through local authorities.

For more information, please contact: [Stephanie Kleynhans@shelter.org.uk](mailto:Stephanie.Kleynhans@shelter.org.uk) or 0344 515 2044

¹¹ https://england.shelter.org.uk/_data/assets/pdf_file/0010/1939510/2020-09-21_-_Renters_at_risk_Final.pdf