

Rt Hon Michael Gove MP

Secretary of State
Department for Levelling Up, Housing & Communities
2 Marsham Street
London, SW1P 4DF

21 February 2023

Dear Secretary of State,

MEETING WITH NATIONAL HOUSING AND DOMESTIC ABUSE POLICY AND PRACTICE GROUP

We are writing to you, as the [National Housing and Domestic Abuse Policy and Practice Group](#), led by the [Domestic Abuse Housing Alliance \(DAHA\)](#). We would like to invite you to meet with our Group Chair, Deidre Cartwright, to discuss how we as a group can support you to deliver the Government objective to significantly 'improve the quality of homes in which every citizen lives'.

Our group brings together experts from the housing, domestic abuse, and violence against women and girls' (VAWG) sectors from commissioning, charity, and policy perspectives. We support statutory agencies, government departments, and the private sector to deliver safe and suitable housing for survivors of domestic abuse. We are well-placed to support you to fulfil the ambitions underpinning the Government's landmark Domestic Abuse Act of ensuring all survivors are given the protection and support needed to escape their abusers and transition into safe independent lives.

Organisations within this group have been closely monitoring the implementation of the Part 4 duty on tier one local authorities to commission safe accommodation. Whilst we have been pleased to see a significant increase in commissioning of safe accommodation in 2021-22, which will help to meet unmet demand for refuge beds across the country, we are concerned that the quality and specialist status of services are not being given due consideration. It is essential that specialist services are protected by this duty and given adequate funding, estimated by Women's Aid to be £185 million per year¹.

Why domestic abuse is a significant housing issue

As you will know, through your role as Co-Chair on the National Expert Steering Group for Part 4 of the Domestic Abuse Act 2021, domestic abuse is a housing issue, as it directly impacts on a survivor's right to a safe and stable home.

- Perpetrators create a context of fear and curtailed freedom usually within the home, a place where women and children should feel safe². Home is tragically the most likely place where a victim of domestic abuse will be killed by her abuser³.
- Although each survivor's experience is different, housing is the primary barrier for women attempting to leave abuse. In a recent Women's Aid survey, 70% of women said concerns about

¹ Women's Aid (2023) The Annual Audit 2022

² Women's Aid. (2020) The Domestic Abuse Report 2020: The Hidden Housing Crisis. Bristol: Women's Aid.

³ ONS (2016) Compendium – Homicide (average taken over 10 years). Retrieved from <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/compendium/focusonviolentcrimeandsexualoffences/yearendingmarch2015/chapter2homicide>. Ingala Smith, K. and Women's Aid (2017) The Femicide Census Report 2016. Ret

homelessness or lack of safe housing prevented them from leaving an abuser. These forces survivors including children, to remain in dangerous, traumatic, and life-threatening circumstances with the perpetrator.⁴

- Domestic abuse is a significant trigger of homelessness. It is currently the second most common reason for [households approaching English councils for homelessness relief](#)⁵. However, once triggered, the ongoing causes of homelessness are structural: the inability to afford or access a suitable settled home in the market; or the inability to keep or access a genuinely affordable socially rented home.
- Perpetrators of abuse use a shared tenancy with a survivor as a form of economic abuse and coercive control, which can lead to survivor being criminalised for anti-social behaviour, accruing rent arrears or other tenancy related debts, and even losing her tenancy, and facing homelessness due to the perpetrator's actions.

Upcoming legislative opportunities to address survivors' housing rights

There are critical opportunities for you to support survivors of domestic abuse in upcoming legislation. This includes: the Social Housing (Regulation) Bill, Supported Housing (Regulation Oversight) Bill and Renter's Reform Bill, these actions could 'level up' the housing offer for survivors of domestic abuse.

Through the Social Housing Regulation and Renter's Reform Bills there is an opportunity to support both private and social landlords to address the critical links between Anti-Social Behaviour (ASB) and domestic abuse, which will support survivors to maintain safe and stable housing while reducing the risk of ASB which negatively impacts tenants, housing providers and neighbours.

However, we are greatly concerned that the Government's recent recommendation within the DLUHC Report on Reforming the Private Sector, to make "further adjustments to the discretionary grounds for possession in response to antisocial behaviour are also necessary⁶." The negative implications of these changes for survivors of domestic abuse, could lead to the misidentification of domestic abuse as ASB, and lead to eviction and homelessness for survivors, when the Government should be supporting survivor safety. Government must consider these implications for survivors, and to ensure safeguards are put in place.

Additionally, through the welcome regulation of exempt accommodation providers through the Supported Housing (Regulation Oversight) Bill, there is an important opportunity to ensure that survivors of domestic abuse are not exposed to harmful environments fostered by 'rogue providers'. We want to support your department to ensure that the Bill is effective in eliminating dangerous and profit-driven models of supported housing, and meanwhile preserving national network of specialist refuges, which provide life-saving support to domestic abuse survivors fleeing abuse.

⁴ Women's Aid. (2020) The Domestic Abuse Report 2020: The Hidden Housing Crisis. Bristol: Women's Aid.

⁵ DLUHC. Statutory Homelessness April-June 2022 (Q2) England [Live tables on homelessness - GOV.UK \(www.gov.uk\)](#)

⁶ <https://committees.parliament.uk/publications/33924/documents/185831/default/>

An invitation to meet

Our group would very much welcome the opportunity to discuss these current and upcoming legislation opportunities with you in more detail. Please contact our Chair, Deidre Cartwright to arrange this by emailing d.cartwright@standingtogether.org.uk

Sincerely,

The National Housing & Domestic Abuse Policy & Practice Group

- Against Violence & Abuse (AVA)
- Agenda Alliance
- Angelou Partnership
- Birmingham & Solihull Women's Aid
- Chartered Institute of Housing (CIH)
- Commonweal Housing
- Crisis
- Domestic Abuse Housing Alliance (DAHA)
- The DRIVE Partnership
- Employers Initiative on Domestic Abuse (EIDA)
- Ending Violence Against Women (EVAW)
- Generation Rent
- Gento Housing Association
- Hestia
- Homeless Link
- National Housing Federation (NHF)
- National Federation of ALMO's
- Peabody Housing Association
- Refuge
- Resolve ASB
- Respect
- SafeLives
- Shelter
- Single Homeless Project (SHP)
- Solace Women's Aid
- Standing Together Against Domestic Abuse
- St Mungo's
- Surviving Economic Abuse (SEA)
- Women's Aid Federation of England (Women's Aid)