

The Renters' Rights Bill (RRB)

DAHA-led National Domestic Abuse Policy & Practice Group Response

The National Housing and Domestic Abuse Policy and Practice Group (the “[National Group](#)”) welcomes the government’s Renters’ Rights Bill and its efforts to enhance security and rights for tenants in the private rented sector (PRS). However, we urge policymakers to consider the specific needs of domestic abuse survivors, for whom housing instability is often intertwined with the trauma of abuse. Housing security is critical for survivors seeking to rebuild their lives, and this Bill must ensure that its provisions offer adequate protections for these vulnerable individuals.

Accompanying statutory guidance should be drafted in collaboration with partners across housing, homelessness and domestic abuse sectors including specialist by and for services to ensure equity for all. It should not make the presumption that tenants, including survivors of abuse know their rights. We know that the power imbalance between landlord and tenant is such that if a tenant receives an eviction notice, for instance, they are likely to leave without question. We believe that an intention behind this Bill is to redress this power imbalance and so we must see accessible advice and guidance available and given to all tenants when committing to a tenancy and demonstrable action taken by landlords to signpost tenants for independent legal advice.

We highlight:

- **Ending Section 21 'No-Fault' Evictions:** The Bill’s move to abolish Section 21 evictions is a positive step towards improving housing security and we support its immediate implementation. The elimination of Section 21 evictions is a landmark change that addresses a major driver of homelessness. This reform will allow tenants to feel more secure in their homes without the looming threat of unfair evictions. There will still be some no-fault eviction grounds under the new system (e.g. if they are selling or moving in), so it is vital that proper safeguards are in place to make sure these are not falsely or unjustly used, and that when they are used, harm to the tenant is minimised. Importantly, all new no-fault grounds should be discretionary to allow courts to consider all factors and where possible avoid or postpone a damaging eviction.

We are working with partners to develop a Pre-Eviction Protocol (PEP) that will serve to identify when the presenting grounds for eviction are rooted in domestic abuse. We urge the government to make a requirement for landlords to follow this PEP before an eviction order is served and to satisfy, if necessary, judges that the landlord has given due consideration to all tenants’ circumstances and offered suitable pathways to specialist advice and support where appropriate.

- **End of fixed-term tenancies** is welcomed, not least because it creates a much simpler tenancy structure, offering greater flexibility for domestic abuse survivors choosing to flee their abusers.

While the end of fixed-term tenancies does allow this greater flexibility, survivors of abuse may still face threats of eviction if their tenancy becomes destabilised due to domestic and economic abuse. Protections must be strengthened to ensure that survivors are not

disproportionately affected by landlords seeking possession under other grounds, such as the sale of the property or for personal use.

We are concerned, too, that the Bill will bring in changes which require tenants to give two months' notice to leave their homes, as opposed to one month under our current system. A longer period to vacate a property could prevent survivors from moving quickly if they believe they must give such long notice. The government should maintain the current one-month requirement for tenants to give when leaving their home. This gives landlords ample time to find new tenants and removes this barrier for survivors.

- **New possession grounds and minimum tenancy requirements:** The extension of the minimum notice period for possession under 'landlord need' grounds to four months, and the restriction on using these grounds in the first 12 months, is welcomed. However, for domestic abuse survivors, even these protections may not be sufficient. Survivors often face urgent and unpredictable housing needs, and they should be prioritised for emergency housing support where landlords seek possession. A more flexible approach for survivors, particularly those in immediate danger, is essential to prevent homelessness and further trauma.
- **Greater breathing space for survivors of abuse in rent arrears:** We welcome the change in the Bill to increase the amount owed before a tenant can face an eviction from two months to three. This is a positive move which will afford survivors of abuse, the vast majority of whom are subjected to economic abuse, much-needed breathing space in remaining in their homes for longer and finding support which will help them to pay off their arrears. The Bill, however, should go further to ensure that victims and survivors are not evicted from their homes because of economic abuse. The Bill should remove the mandatory rent arrears ground, ground 8, entirely, meaning that all rent arrear evictions would go through the discretionary ground, ground 10, ensuring that extenuating and personal circumstances, such as domestic abuse, could be considered in all eviction proceedings.
- **Rent increases and survivors' economic stability:** Domestic abuse often leaves survivors in economically precarious situations. Provisions allowing tenants to challenge excessive rent increases are a step in the right direction, but further safeguards should be introduced to protect survivors from sudden and unaffordable rent hikes. Many survivors already face economic abuse, where control over finances is used as a tool by abusers. To mitigate this, we recommend that protections are strengthened for all renters by placing a cap to in-tenancy rent increases at the lowest of inflation or wage growth alongside investment in Local Housing Allowance and removal of the benefit cap as measures to address affordability.
- **Application of the Decent Homes Standard (DHS) and Awaab's Law:** We welcome the extension of the Decent Homes Standard and Awaab's Law to the PRS. Domestic abuse survivors are often forced to endure unsafe and unfit living conditions due to their abusers' economic control or coercion. These new standards must be rigorously enforced to ensure that survivors have access to safe, healthy homes. Clear pathways must be established for survivors to report housing issues confidentially, without fear of retaliation or eviction.

- **Local authority powers and enforcement:** The strengthening of local authority investigatory and enforcement powers is crucial, particularly in cases involving domestic abuse survivors. Survivors may be reluctant to report issues or challenge landlords due to fear of further victimisation. Local authorities must equip their work force to recognise domestic abuse and coercive and controlling behaviour, so to better support survivors in these situations. Ensuring that local authorities are well-resourced to identify and act upon housing violations, especially where they intersect with domestic abuse, is vital to ensuring safe housing for survivors.
- **A Private Rented Sector Database:** The introduction of a digital PRS Database is a positive development, offering greater transparency and better access to information for tenants. The database could also include information and resources for survivors, ensuring they know their rights and how to access support.

In summary

The Renters' Rights Bill represents significant progress in improving security for tenants, but it must go further to address the specific needs of domestic abuse survivors. Housing is a lifeline for those escaping abuse, and the Bill should prioritise their safety and stability. We recommend that the government work closely with members of this group from housing, homelessness, and domestic abuse sectors to ensure that the legislation fully protects survivors from housing insecurity and further harm. By embedding a trauma-informed approach into the Bill's provisions, the government can ensure that no survivor is left exposed to homelessness, exploitation, or continued abuse.

While these reforms are significant, we must also highlight our concerns, particularly around how the Bill addresses anti-social behaviour (ASB) and its potential unintended consequences for survivors. Survivors are disproportionately impacted by ASB complaints, as the signs of abuse, such as noise or disturbances, are often misinterpreted by landlords, neighbours, or authorities. Misidentifying domestic abuse as ASB can lead to unjust evictions, further endangering survivors. We urge the government to introduce clear safeguards to ensure that ASB complaints related to domestic abuse are handled with the sensitivity and understanding they require.

We are also concerned that while the Bill proposes measures to cap rent increases, it does not go far enough to address the affordability crisis facing survivors. The economic burden of fleeing an abuser is immense, and without robust rent controls, many survivors will continue to face unaffordable rent hikes, forcing them into dangerous situations or homelessness.

Additionally, while we support the measures to ban discrimination against tenants with children or those in receipt of benefits, we urge the government to strengthen enforcement mechanisms. The Bill should abolish Right to Rent and introduce limits on the situations in which a landlord can demand a guarantor or multiple months' rent upfront to address upstream practices leading to discrimination.

Survivors, particularly those with insecure immigration status or those who are economically dependent on their abuser, continue to face significant barriers in securing safe, affordable housing.

We urge the government to end the hostile environment in the private rented sector for migrants. This Bill provides a key legislative opportunity to end the detrimental right to rent policies which

have devastating consequences for migrant survivors with No Recourse to Public Funds (NRPF) escaping abuse. Survivors with NRPF are often turned away from refuge spaces due to barriers to them accessing housing benefits. In this scenario, right to rent checks close off the avenue of the private rented sector to survivors and make them vulnerable to exploitative and criminal landlords.

The Bill's commitment to introducing a landlord register and the extension of Rent Repayment Orders are positive steps towards improving accountability and standards within the private rented sector. However, we must ensure that survivors can easily access this system and that landlords are held to the highest standards of care and responsibility, especially when dealing with tenants fleeing abuse.

To conclude, while the Renters' Rights Bill introduces much-needed reforms, it must go further to fully address the unique challenges faced by survivors of domestic abuse, including migrant survivors. Housing security is vital to a survivor's ability to escape abuse and rebuild their lives. We look forward to working with the government to ensure that this legislation provides comprehensive protections for survivors, ensuring they have access to safe, secure, and affordable housing.

About the National Housing and Domestic Abuse Policy and Practice Group

The National 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. See [here](#) for a list of members

About Standing Together and DAHA:

The Domestic Abuse Housing Alliance (DAHA) is part of the Housing Team programmes within Standing Together Against Domestic Abuse, a national charity bringing communities together to end domestic abuse. The DAHA Programme is dedicated to improving the housing sector's response to domestic abuse. Through accreditation, training, and advocacy, DAHA works to ensure that every survivor of domestic abuse can access safe and secure housing.

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