



daha

Domestic Abuse Housing Alliance

CONSULTATION RESPONSE

Department for Levelling Up, Housing & Communities:

Consultation on reforms to social housing allocations

26 March 2024

Judith Vickress, Head of Housing,

Standing Together Against Domestic Abuse



Introduction

The Domestic Abuse Housing Alliance (DAHA) are an alliance of over 150 members who include registered social landlords, and local authorities. It is an established, award winning, programme managed by Standing Together Against Domestic Abuse that is committed to improve the housing sector's response to domestic abuse. DAHA Chair the National Housing & Domestic Abuse Policy and Practice Group (the National Group) set up in 2017 with representatives from across the housing, homelessness, and domestic abuse sectors, and aim to find consensus, share best practice, and influence policy and practice on domestic abuse and housing in England and devolved authorities. We recognise that those who have experienced domestic abuse or violence and other forms of abuse in the home, have insight and knowledge that service providers can learn from to improve joined up multiagency working. It is for this reason that we aim to ensure survivors' perspectives are embedded in the effective planning, delivery, and monitoring of partnership initiatives. The National Group representative organisations are submitting individual responses to this consultation, but we have discussed our proposed responses and clearly have shared concerns.

We welcome the opportunity to submit this response to the Government's Social Housing Allocations Consultation. We believe it is imperative to ensure that any changes or policies implemented consider the unique needs and challenges faced by victims/survivors of domestic abuse.

We agree with the statement made by [Homes for the South West](#), which include some of our DAHA members, [recently published](#) on their website: ***"We can see no way in which the government's proposals will significantly reduce local authority housing registers or help the 140,000 children and their families secure a stable, affordable place to call home; in fact, they may well hinder it. The government's focus should be on how more affordable social homes can be delivered, rather than on how to make access to the UK's shrinking pool of social housing more difficult for the people and families that need it most"***.

From discussions with members, a majority, if not all, share this view, believing this to be an unnecessary consultation whilst we are awaiting, still, 2 years later, the outcomes of two [government consultations on joint tenancies and local connections](#).

The government correctly identifies the significant pressures on social housing as a scarce resource. The critical issue here is the lack of social housing supply and a severe housing shortage overall, due to a failure to develop at the scale needed over many years. In 2022-23 only 9,561 social rented homes in England were delivered, compared to nearly 40,000 in 2010. In the last quarter of 2022-23, 104,510 households were in [temporary accommodation](#) including 131,370 children. On any given night in 2022, 242,000 people were experiencing the [worst forms of homelessness](#). We need to focus efforts on supplying more social homes, so that more households with housing needs and low incomes can access it, rather than further limiting an already scarce resource. To this end, therefore, the correct response to this shortage is to build more social housing and increase the resource to meet the level of need. [Across the UK we](#)



[require 350,000 new homes a year of which 145,000 should be affordable and 90,000 for social rent.](#)

We foresee dire consequences of the government's proposals outlined in this consultation. We will see a rise in homelessness applications which will increase pressures on already buckling local authority homelessness services, together with a significant increase in pressure on Social Care teams as we see more referrals for children who will meet requirements for a service under the Children's Act 1989, and for adults at risk who meet thresholds under the Care Act 2014. It is inevitable that the outlays for use of temporary accommodation will spiral – local councils paid [£1.74 billion on temporary accommodation](#) in 2022/23; and many are in [financial distress](#) currently – some having issued s.114 notices and others close to doing so because of escalating costs.

We strongly believe, as do many across the housing sector, that local housing authorities are best placed to manage their waiting lists, using appropriate connection, income, and other tests, to reflect & manage their existing housing stock and plans to develop, as already occurs under the Localism Act 2011. It is important that any such tests are used as guidance only and do not prevent discretion which is necessary to provide the best and often safest response where some applicants who may not meet the criteria but have clear mitigating circumstances that mean it is essential to provide an effective and often immediate housing response.

Considering this, we welcome the opportunity to contribute our insights and recommendations to the consultation from **pages 9-14** below.

Domestic Abuse - the facts

The [Crime Survey for England and Wales \(CSEW\)](#) estimated 5.7% of women and 3.2% of men experienced domestic abuse in the year ending March 2023.

A report released this month by the [National Police Chief's Council \(NPCC\)](#) examining domestic abuse related deaths in England and Wales has shown the scale of domestic homicides, and for the first time has recorded an increase in suspected suicides by domestic abuse victims.

The [report](#) examines all deaths identified by police as domestic abuse related.

Key findings from the report

A total of 242 domestic abuse related deaths were recorded between April 2022 to March 2023, including:

- 93 suspected victim suicide following domestic abuse
- 80 intimate partner homicides
- 31 adult family homicides
- 23 unexpected deaths
- 11 child deaths



- 4 'other' deaths (individuals living together who are not family members or intimate partners)

The majority of victims were female aged 25-54 years old, and majority of perpetrators being male and of the same age bracket. This is consistent with previous years.

Victims/survivors of **domestic abuse** often find themselves in precarious housing situations, where their safety and security are compromised. It is essential that social housing allocations prioritise the safety and well-being of these individuals including children and provide them with the necessary support to rebuild their lives free from violence and coercion.

Domestic abuse is a housing issue.

Domestic abuse is by its very nature a housing issue, with perpetrators creating a context of fear and curtailed freedom usually within the home, a place where women and children should feel safe. Safe, affordable housing – including social homes – for women and children escaping violence against women and girls (VAWG) is an urgent priority.

We see firsthand the devastating cost of the housing crisis on survivors, who are often forced to 'choose' between homelessness and housing insecurity or remaining with a perpetrator, leaving them in trapped situations. But the government's proposals to restrict access to the social housing register based on the number of years households have lived in the UK, or within their local area, will do nothing to tackle this. Instead, survivors will face even greater restrictions to accessing the severe lack of social housing and these policies will contribute further to the already existing hostile environment facing migrant women. It is extremely concerning that the changes will remove access to social housing for migrant women who do have recourse to public funds (NRPF), such as refugees, despite their eligibility being protected by international law.

All survivors' safety and housing needs are different, with some survivors requiring access to lifesaving refuges and long-term social housing to become safe from their abuser and rebuild their lives, while others need to stay safely within their own home, to maintain employment, access their children's school, family, and support networks, and maintain stable housing.

Because of these differences in need, survivors require a range of housing and support options that enable them to have the viable choice to remain within their accommodation, if it is safe and their choice to do so, or to access alternative safe accommodation. For this reason, our [National Group](#) worked together to develop the [Whole Housing Approach](#) to domestic abuse, which is a local approach that brings housing and specialist domestic abuse services together to provide a range of safety and support options for survivors in any tenure type or housing circumstance to address their housing and safety needs. We have seen a substantial increase in local authorities taking on a Whole Housing Approach in response to their new Part 4 duties under the Domestic Abuse Act 2021 (DA Act).



Many survivors, including children, who are forced to flee their home and local area to become safe from domestic abuse face barriers to accessing safety and housing stability in a new local area. This includes some local authorities continuing to apply a local connection test when allocating social housing, which leads to the disqualification of a significant proportion of survivors who must flee to an unknown area to become safe. Therefore, we have, in our [response](#) to the government's Local Connections consultation (2022), strongly recommended that the Government makes regulations to require local authorities to ensure that victims of domestic abuse are exempt from local connection and residency requirements. However, the government must monitor local authority implementation of these provisions and recommend that allocations teams are trained and supported to implement these changes. This should be a part of housing providers' wider response to domestic abuse, as set out through the [DAHA accreditation framework](#) and a part of a local authority's Whole Housing Approach to domestic abuse.

Relationship between Domestic Abuse and Homelessness

It's a bleak reality, and the relationship between domestic abuse and homelessness is a complex one. Research conducted by [Crisis](#) found that domestic abuse is a leading cause of homelessness among women, with 32% of female rough sleepers citing domestic abuse as the primary reason for their homelessness. So, for many people, women in particular, domestic abuse is the reason they become homeless in the first place; for others, homelessness leads them into relationships with abusers who actively seek out those who are vulnerable.

The full scale of the problem is largely unknown. Existing [ONS data on domestic abuse](#) largely reflect the experiences of survivors within household settings. Those fleeing from domestic abuse often fall into the category of '**hidden homelessness**', with nowhere and no one to turn to. This makes it incredibly difficult to understand the full extent of the issue, with many victims hidden from view and not accessing support as a result. Relying heavily on friends and family for temporary accommodation and afraid to alert the local authorities, survivors will often be left out of mainstream statistics. These victims/survivors are "unseen" and so, unheard.

In 2017, [over 6,000 people were accepted as homeless by their local authority](#) as a result of a violent relationship. This made up over 10% of all homeless applications that year.

In November 2023 the government published statutory homelessness figures showing that nearly 139,000 children are homeless in temporary accommodation, up 14% on the previous year. We are told that 7,500 families with children are living in hostels and B&Bs – often found to be the worst type of temporary accommodation where entire families are cramped into one room, forced to share beds and deal with safety and health hazards like faulty electrics, damp and mould. Most perceptions of support in the context of emergency and temporary accommodation focus on physical safety. However, we know from victims/survivors that it is crucial to consider "more-than-safety", such as in, [Janet Bowstead's Spaces of safety and more-than-safety in women's refuges in England article \(PDF 634KB\)](#). This concept includes



recovery, survivors' autonomy, freedom and preparing for independence beyond temporary accommodation settings, as well as protection.

The figures also revealed that over 73,600 households faced homelessness in England between April and June 2023 – up 3,000 on the previous year.

The report published by ONS this year; [Women who have survived domestic abuse and their experiences of temporary safe accommodation in England: January to June 2023](#) – a qualitative research exploring the experiences of 40 women who have survived domestic abuse with current or previous experience of temporary safe accommodation in England, tells us that victims/survivors experience barriers accessing and moving on from temporary (safe) accommodation, including a lack of available accommodation and suitable options, lack of information on accommodation types and available support, having to navigate complex processes, and not feeling involved in decisions affecting them. It is essential, therefore, that we make systems and processes less complex and remove barriers where we see them, and not create more barriers for victims/survivors. The government must put the voices and experiences of victims/survivors at the heart of policy and centrally made decisions and demonstrate through their actions, that they see them, they listen to them and that they *hear* them.

Demand for services outweighs supply.

Housing is one of the biggest barriers to someone leaving their abuser. Fear of becoming homeless is a real and justified fear. According to a report from [Women's Aid](#), the number of refuge bed spaces in 2019/20 was 30% lower than that recommended by the Council of Europe. Furthermore, a staggering 64% of refuge referrals were denied.

Separation is the point at which someone is most likely to be murdered by their former partner. Victims/survivors know this and so for them to make the decision to seek help and make that move takes inordinate courage and requires a safe and urgent response from any professional – often housing – who understands the immediacy of safety needs.

When the strain on services was already starting to show in 2019, it's frightening to think how many people have since become homeless due to a lack of emergency accommodation when they leave their abuser.

Despite requirements by the [2021 Domestic Abuse Act](#) for local authorities to provide safe accommodation, many don't have the resources to meet these statutory obligations. The result is that many victims feel as though they're left with no choice but to return to a violent partner while waiting for local authority intervention.

Discrimination

We are profoundly concerned about the proposed changes to social housing allocations as a means of tackling a chronic lack of suitable social housing. The 'British homes for British people' headline used by the government in launching this consultation, is a deeply offensive,



racist, and xenophobic rhetoric designed, it feels, to mislead the public into believing the scarcity of social housing is because social housing is largely allocated to migrants to the UK. The truth is that in 2021-22, 90 percent of allocations went to UK nationals, and of the remaining 10 percent, 5 percent were to EU nationals. There are already stringent legal and regulatory [requirements](#) to ensure that people without the right to remain are not able to access social housing. Three-quarters of migrants to the UK in the last five years in fact live in the private rented sector, rather than social housing.

Families with a history of anti-social behaviour (**ASB**) still require housing so where, under the “three strikes and you’re out” policy, are those evicted and denied access to social housing supposed to live?

The Renters (Reform) Bill seeks to deny these families and individuals access to the private rented sector (PRS) so, again, where are they supposed to live? The streets? It is impossible to imagine that in Britain in the 21st century, that we would actively be designing policy that pushes our citizens into homelessness, but here we are with proposed social housing reforms that do exactly that.

Social landlords, in partnership with statutory and third sector partners, are practiced in supporting families to address and change behaviours to help them sustain their tenancies. We urge that the government instead, “think solution”, and look to increase investment to develop these vital local partnerships, so relevant support services will be much more effective in the long term in addressing ASB, and improving the lives of those families and communities affected by it.

Further, we believe that the proposed changes as they stand would create further barriers and discrimination towards survivors of domestic abuse and other forms of VAWG, preventing them from accessing safe and affordable housing. Marginalised groups will be disproportionately impacted. Migrant survivors of VAWG will be forced to face yet another barrier in the already existing hostile environment.

Public Sector Equality Duty

Without an exemption for victims and survivors of domestic abuse who are settled in the UK with DVILR, the UK connection test is likely to have a particular impact on Black and minoritised victims and survivors. It is important here to clarify that not all migrants are from Black and minoritised communities and that non-EU migrants continue to make up [a majority of non-UK born citizens](#).

Laws and practices around domestic abuse and child and adult safeguarding identification and prosecution are likely to be, in the main, more rigorous in the UK than in the countries of origin of most migrants. Language barriers combined with a fear of immigration enforcement and policing present additional barriers for many migrant victims/survivors, who may not know and/or are unable to access their full rights under the law. To ensure that migrant victims/



survivors are supported to identify abuse, access safety and specialist by and for domestic abuse support; safe, stable housing must be available to them, with a choice to stay in the community they feel safest in and where their longer-term recovery is more likely to be meaningful and successful.

These victims/survivors will be unfairly impacted by lack of access to social housing under the proposed UK connection test, which could stall their recovery and put them at risk of future harm.

Without an exemption for all victims/survivors of domestic abuse, the local connection test is likely to have a particular impact on people protected under the sexual orientation, gender reassignment, and religion or belief protections of the Equality Act – including LGBTQI+ survivors and survivors from close or closed religious communities. In some communities, they might be at particular risk of so-called honour-based abuse. The risks which they could face in their local area go beyond the direct risk of abuse from the intimate partner abuser and could extend to violence and abuse from the extended family and wider community. This not only increases risks to these victims and survivors, but also limits the support which they can receive in their local area. As a result, they may need to move out of the area where they have local connections and seek safety elsewhere. It is therefore vital that they can access permanent housing elsewhere, to ensure their safety.

Our Recommendations

UK connection test

Recommendation 1: Do not to introduce a UK connection test. It is unnecessary, unfair, and overtly discriminatory.

Recommendation 2: Withdraw the damaging rhetoric “British Homes for British People”.

The government must lead with an anti-racist approach and recognise the damage this message sends to the public and potential for hate towards non-UK Nationals, including migrants and those seeking refuge in the country as a place of safety. Be clear in messaging that, in fact, 90% of social lettings are made to UK nationals.

Recommendation 3: If this test is introduced there must be an exemption for those who have recourse to public funds & indefinite leave to remain under Domestic Violence Rule (DVILR) from the UK connection test.

If the government do introduce a UK connection test it will have a significant negative impact on migrant victims and survivors of domestic abuse – particularly those with indefinite leave to remain under the Domestic Violence Rule (DVILR) – and their children, who are now recognised as victims. By putting in place further requirements, it will become even more difficult for migrant victims of domestic abuse to access social housing, making them inherently more vulnerable to further abuse. Migrant victims and survivors of domestic abuse already face significant barriers to disclosing abuse and accessing support, including housing. The lack of a safe reporting mechanism means that many do not report in the first place for fear of contact with Immigration Enforcement, and often those who do still face significant limitations in accessing support because of the no recourse to public funds (NRPf) condition.

Migrant victims and survivors who are on spousal visas are eligible to apply for indefinite leave to remain under the Domestic Violence Rule (DVILR), so enabling them to access public funds, including Housing Benefit, and no longer requiring them to be subject to immigration control. This pathway is well established by the Home Office and within the domestic abuse sector, allowing migrant victims and survivors of domestic abuse to access support and rebuild their lives following abuse.

Access to DVILR stops the continuation of ‘revolving door cases’ which involve repeat crisis calls to the police and adult social care and allows migrant survivors to begin to rebuild their lives and enter employment – therefore contributing positively to the national economy. This



option for permanent accommodation is in many cases, a lifeline, especially because many of these victims/survivors have been victims of economic abuse and have faced barriers in accessing employment. For these victims/survivors seeking a safe home in the Private Rented Sector (PRS) is not an option.

Under the government proposals, victims/survivors with DVILR would not be eligible for social housing if they have not been resident in the UK for at least ten years. Unlike many other routes to indefinite leave to remain which require a minimum amount of time resident in the UK (ranging from two to ten years), victims and survivors can apply to settle permanently in the UK as soon as their relationship has broken down because of domestic abuse. Applicants should receive a decision within six months – meaning that in some cases, victims and survivors will have indefinite leave to remain less a year after arriving in the UK, with the intention of permanently settling. The proposal seeks to prevent these victims/survivors from accessing social housing for another nine years which will have a significant impact their recovery following abuse and limit their economic contributions to society for over a decade after they leave their abuser. The proposal serves to limit migrant survivors' access to any form of support to crisis and emergency services only for many years – likely to cost the economy more in the long term.

Local connection test

Recommendation 1: Do not introduce a mandatory local connection test

Many survivors escaping domestic abuse need to leave their local authority area to be safe. Leaving an abuser is statistically a highly dangerous time, and survivors can face ongoing and severe threats to their safety. Janet Bowstead's [research](#) shows that 43% of women who seek help after fleeing domestic abuse do so outside their local area. [Women's Aid data](#) from the last year also shows that the vast majority of victims (83%) who were placed in a refuge came from a different local authority area to the refuge they moved to.

Local connection tests for social housing already currently allow local authorities to prioritise applicants who can demonstrate a close association with their local area. Under current provisions, most local authorities require at least a local connection test, if not both a local connection and residency test. The government has already established in existing statutory guidance on local connections and improving access to social housing for victims of domestic abuse, that it is not reasonable or practical for domestic abuse victims to be required to satisfy a local connection test to qualify for social housing, as they often have fled from another local authority where they were previously a resident. We are concerned that proposals to make local connection tests mandatory will further increase barriers to housing access for victims and survivors of domestic abuse.

Recommendation 2: Regulations are put in place which require local authorities to exempt domestic abuse victims from any local connection or residency requirements as part of their qualification criteria as applicants for social housing.

The Social Housing Regulator should be equipped to regulate whether and how local authorities are implementing any new regulations and to act against local authorities who are not implementing exemption requirements. These regulations must be supported by a requirement for training and guidance to local areas on implementing the regulations, including ensuring that housing application forms require sensitive enquiry into domestic abuse, consistent recording, and safe, appropriate response to disclosures.

Guidance should also recommend that allocations management systems clearly identify and flag applications for survivors of domestic abuse. They may be presenting as homeless for a variety of reasons and have multiple disadvantage with domestic abuse often not the presenting issue. The guidance should specify that information seeking and sharing must take place between housing teams, organisations, and local authorities, where victims/survivors may first present as homeless and then sign on to a housing register. This seeking and sharing of information should ensure that allocations teams identify survivors early on who should not have the local connection test applied, but also so that evidence already provided by victims/survivors to demonstrate homelessness because of domestic abuse can be used instead of requiring victims/survivors to re-tell their experiences over and over – something we know to be a barrier for many victims/survivors to seek help, and a significant cause of victims/survivors disengaging from services and processes.

Recommendation 3: Government must finally publish the findings and response to the consultation on local connection requirements for social housing for victims of domestic abuse (2022),

It is nearly 2 years since the government launched their consultation on local connections but there has been no response published or outcome from that consultation. This is unacceptable. See our Response (May 2022) [here](#)

Recommendation 4: If a local connection test is introduced, we strongly support exemptions for young people leaving local authority care.

Many will be in the care system directly or indirectly because of domestic abuse. They may have no parents or family in the UK, or not be able to rely on them to support with accommodation and can really struggle to access the PRS because of income restrictions.

Income test

Recommendation 1: Do not to introduce a national mandatory income test and continue to allow local discretion.

Local authorities currently have discretion as to

- (i) whether to set an income test and
- (ii) decide what the maximum income should be.

This allows local housing authorities to respond locally to widely varying local housing needs and markets. For example, in most London boroughs maximum income criteria for a social home would have to be much higher to tackle homelessness.

Recommendation 2: Assess only the income of the applicant.

Victims/survivors of domestic abuse are often subjected to economic abuse so it is vital that income shouldn't be assessed based on existing joint tenants or household members, who may be their abusers. As we have said above, domestic abuse is a major cause of homelessness adversely affecting women and children who can struggle to afford a suitable private rental on their sole income. We agree the incomes of adult children should not be included unless they've applied as a joint tenant.

Any income test, if introduced must not be based on either:

- (i) a national income cap nor
- (ii) on household earnings.

This will be a barrier preventing victims/survivors of domestic abuse from fleeing from their abuser. However, if the government does set a national income cap for the two highest earners in a household, then it should certainly reflect average gross incomes in England, which are currently £34,900. This equates to around £70,000 for two earners. Any cap should be linked to median earnings and have the capability go up regularly, yearly or as appropriate, reflecting the national economy.

Recommendation 3: Capital assets, such as savings and property, must not be included in the income assessment if they're insufficient to purchase a suitable home in the locality.

Most homelessness involves families with dependent children who are unable to afford to buy or rent a decent and adequate family home. Lone parents, mainly lone mothers, are overrepresented in homelessness. Domestic abuse rarely stops on separation. It is common for single-parent families to become homeless fleeing domestic abuse. Victims/survivors often face economic abuse as part of the post-separation abuse so commonly experienced. Even with their share of the sale of a previous home where proceeds may be split, they may fail affordability checks for a private rental, due to low income. Financial settlements post separation can take months or years and have a very significant impact on household income and finances.

Recommendation 4: Individuals/families who are statutory homeless in temporary accommodation should also be exempt from the income test.

The local authority homelessness assessment will have already established that the household is homeless under the law because they cannot access a suitable private rental without additional assistance.

Recommendation 5: Homes should be allocated on need and there must not be a minimum income requirement.

Minimum incomes would prevent people on below-average incomes from joining the waiting list, including many households who are homeless in temporary accommodation. This wouldn't tackle record homelessness. Social rent homes are the only homes that are tied to local incomes, so are the best way for people on below-average incomes, including, for instance, unpaid carers, to secure a permanent, affordable, and well-regulated home.

Anti-social behaviour test

Recommendation 1: There must be no mandatory anti-social behaviour test.

This does not seek to tackle homelessness but indeed, causes homelessness. The answer to anti-social behaviour (ASB) should never be to make people homeless. We would be significantly concerned that in many cases domestic abuse will be misidentified as ASB leading to the eviction of a victim of domestic abuse under the proposed dehumanizingly termed 'three strikes' policy. Even where ASB is established under the behaviour sanctions outlined in the proposal – this could still be a misidentification of domestic abuse. Tenants who are experiencing domestic abuse are **four times** more likely than other tenants to have ASB complaints made against them, often because of domestic abuse being misidentified by neighbours or professionals as ASB. If there is a mandatory ASB test, then it is essential that there are exemptions. We strongly support exemptions to the anti-social behaviour test for both survivors of domestic abuse and for people with disabilities or health conditions which may contribute to anti-social behaviour.

ASB criteria should be left to the discretion of local housing authorities. In some localities, the allocation of a social home, with adequate support to prevent criminal or nuisance behaviour such as Housing First schemes such as that we see in [Westminster](#), may be the best housing option to tackle homelessness. If councils are unable to allocate social homes, they have fewer options to tackle homelessness and help people out of expensive temporary accommodation.

Recommendation 2: DLUHC should adopt a pre-eviction protocol (DAHA are currently working with sector colleagues to develop such a protocol) and accompanying guidance on anti-social behaviour, to ensure that victims and survivors are not wrongfully evicted because of domestic abuse which has been misinterpreted as ASB.

It is not enough to say that judges will have guidance on eviction decisions to prevent victims/survivors of domestic abuse being wrongfully evicted. The threat of eviction can often be enough for vulnerable and disempowered tenants to leave a property and become homeless – often street homeless. It is essential that landlords (social and private) are required to go through a pre-eviction protocol which is designed to sensitively support the tenant (using a coordinated community response (CCR) approach) to avoid homelessness. Guidance should be made available, including clear examples of the overlap of ASB and domestic abuse, recommendations for how landlords, managing agents and judges can identify domestic abuse, and signposting to appropriate support agencies – to minimise the risk of eviction.



Recommendation 3: Only the applicant and anyone with whom they wish to have a joint tenancy should be checked.

Applicants shouldn't be disqualified from the allocation of a social home, based on the previous behaviour of, for example, a perpetrator of domestic abuse. This could leave those victims/survivors with children stuck homeless in temporary accommodation for longer because they are being judged for the behaviour of someone they were coercively controlled by and were frightened of.

Recommendation 4: The government focus on and invest in tackling the cause of anti-social behaviour in both social and private rented homes to prevent homelessness and improve lives for all residents in every community affected by ASB.

They must invest in accessible support services, including specialist community led and by and for services and in projects known to work such as [Housing First](#). It makes sense that it is more cost-effective to provide tenancy sustainment support, than to render people homeless by evicting them from a home without providing help with the anti-social behaviour, and potentially moving it on.

End