

National Housing and Domestic Abuse Policy and Practice Group
Written Evidence to the Levelling up, Housing and Communities (LUHC) Committee
on Exempt Accommodation

January 2022

**This paper builds on the response to the consultation from the office of the Domestic Abuse Commissioner and Women's Aid Federation of England which forms the basis of the group's submission.*

About our National Group

In November 2017 the first National Housing and Domestic Abuse Policy and Practice Group was convened, led by the [Domestic Abuse Housing Alliance](#) (DAHA). This was the first-time representatives from major Homelessness, Housing and Domestic Abuse organisations formally met to discuss how to work together nationally to tackle domestic abuse and better connect these policy areas. The main aims of this group are to ensure that:

- The experience of survivors of domestic abuse is more prominent in the housing sector and helps shape improved and enhanced service delivery.
- Women and children can access secure housing and good quality services when experiencing domestic abuse; and
- Co-ordination exists between the housing and Violence Against Women and Girls (VAWG) sectors with regards to domestic abuse.

The group seeks 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 multi-agency 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 group has representatives from the domestic abuse, LGBT+, housing and homelessness sectors.

It includes:

- Against Violence & Abuse (AVA)
- Agenda
- Birmingham & Solihull Women's Aid
- Chartered Institute of Housing (CIH)
- Crisis
- Domestic Abuse Housing Alliance (DAHA)
- Galop
- Gentoo Housing Association
- Homes England
- Homeless Link
- Imkaan

- National Housing Federation (NHF)
- National Federation of ALMO's
- Peabody Housing Association
- Refuge
- Resolve ASB
- Respect
- SafeLives
- Shelter
- Standing Together Against Domestic Abuse
- St Mungo's
- Stonewall Housing
- Surviving Economic Abuse (SEA)
- Women's Aid Federation England

Introduction

The National Group welcomes the opportunity to submit evidence to the Levelling Up, Housing and Communities (LUHC) Committee for this important inquiry into exempt accommodation, which has a significant impact on the safety and welfare of survivors of domestic abuse.

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 safe¹. Although each survivor's experience is different, housing is the primary barrier for women attempting to leave abuse² - 70% of women responding to a Women's Aid survey said their housing situation and concerns about future housing, including fears of homelessness or lack of safe housing, prevented them from leaving an abuser³. The existing landscape for exempt accommodation is fraught with providers lacking the motivation, care, expertise, experience, or quality assurance in supporting women and children fleeing domestic abuse⁴. Consequently, National Group partners have witnessed a sharp increase in the delivery of highly unsafe schemes which severely undermine the safety of domestic abuse survivors.

Our evidence submission responds to the central questions of the inquiry to set out how existing forms of profit-driven and unregulated temporary accommodation are not sufficient to meet the needs of women and children escaping domestic abuse, and therefore serve to undermine the ambitions of the Domestic Abuse Act 2021⁵.

Key recommendations

1. Greater oversight and regulation is necessary, as well as a review of definitions of care, support, and supervision in Housing Benefit regulations so that unsafe providers are unable to access Housing Benefit in the first place.
2. Caution in putting forward any recommendations which take a broad-brush approach to restricting accommodation which is non-registered or non-commissioned which may disproportionately impact specialist 'by and for' domestic abuse services which are far less likely to be commissioned or be connected to a registered provider of social housing.

¹ Women's Aid. (2020) The Domestic Abuse Report 2020: The Hidden Housing Crisis. Bristol: Women's Aid.

² DAHA (2021) Facts and Statistics. Available [online](#).

³ Women's Aid. (2020) The Domestic Abuse Report 2020: The Hidden Housing Crisis. Bristol: Women's Aid.

⁴ [Domestic abuse: Women 'could die in unregulated refuges' - BBC News](#)

⁵ [Domestic Abuse Act 2021 \(legislation.gov.uk\)](#)

3. Any savings because of regulatory reform of this sector should be redirected to improving the availability of specialist supported accommodation for vulnerable people, including dedicated funding for specialist accommodation-based domestic abuse services, particularly specialist by and for services for Black and minoritised, LGBT+, and deaf and disabled survivors.
4. Issue a specific directive to local authorities to withhold enhanced housing benefit from providers of specified or exempt accommodation targeting women experiencing domestic abuse where:
 - they are making profit, or there is evidence of a connection with profit making organisations.
 - where survivors or local specialist services providers raise safety concerns.
 - or where they have no experience of or can evidence safeguarding or risk assessment in cases of domestic abuse.
5. Strengthen both the National Statement of Expectations for Supported Housing and National Statement of Expectations for VAWG to enable local authorities to address unsafe and dangerous housing provision.
6. Ensure that the findings from the exempt accommodation pilots in Birmingham, Bristol, Blackburn, Hull, and Blackpool inform changes to the NSE on Supported Housing and NSE on VAWG, in consultation with specialist domestic abuse organisations.
7. Revise the Regulations to specifically exclude providers that do not meet recognised quality standards; do not provide single sex, secure spaces; and do not deliver dedicated support to survivors of domestic abuse, from the definition 'other forms of emergency accommodation'.
8. The DWP should undertake a comprehensive review of Housing Benefit regulations to ensure greater clarity on the level of 'care, support and supervision' required to house victims and survivors of domestic abuse and other vulnerable groups
9. The DWP and DLUHC should also issue guidance to local authorities on assessing housing benefit claims. This should include specific direction on benefit claims for services seeking to offer accommodation to victims and survivors of domestic abuse.

Response

1. What is the quality of exempt accommodation provision?

The exempt accommodation sector includes a wide range of accommodation-based services providing a home to vulnerable people facing housing insecurity, including to many survivors of domestic abuse across the country. Many specialist domestic abuse services utilise exempt accommodation to provide specialist refuge, that is safe, gender and trauma informed accommodation and support to survivors of domestic abuse, including children. When refuge is provided by qualified, quality assured specialist domestic abuse services, they enable women and children to become safe and rebuild their lives free from abuse and achieve long-term safety and housing security.

It is important to recognise that refuge services provide far more than a 'roof' – they provide holistic package of support, delivered by expert staff, to meet the full range of women and children's support needs in a safe and supportive environment, including counselling, practice advice and advocacy, safety planning, children's support, and support to move on from refuge into safe long-term accommodation. It is well evidenced that these specialist services are best delivered by specialist domestic abuse organisations, and by experienced staff who have in-depth knowledge of gender-based violence. Services led 'by and for' Black and minoritised

women, migrant women, Deaf and disabled women, and LGBT+ survivors, are also essential for meeting the specific support needs of these marginalised groups.

These specialist services will already be subject to robust accreditation and oversight from member organisations: for example, in the UK refuge bedspaces for survivors of domestic abuse are advertised on Routes to Support, a database coordinated by Women's Aid Federation England, Women's Aid Federation of Northern Ireland, Scottish Women's Aid and Welsh Women's Aid, which requires those advertising bedspaces to be subject to access criteria. Most of these services will also be accredited members of Women's Aid Federation England,⁶ Welsh Women's Aid,⁷ and/or Imkaan,⁸ meaning they will meet their Quality standards for services supporting survivors of domestic abuse.

Yet, despite the high quality and life saving refuges that offer safe accommodation and specialist support, our National Group partners are greatly concerned by the alarming evidence which demonstrates an increasing number of providers utilising the exempt provisions of Housing Benefit to provide poor quality, unsafe accommodation with very limited to no care, support, and supervision, causing significant harm to the many vulnerable people they house.

Evidence presented by National Group partner Women's Aid Federation England (WAFE) demonstrates that these providers are specifically targeting survivors of domestic abuse, and are placing their wellbeing and safety at great risk, and in some cases leading to death.⁹ These providers not only fail to provide basic evidence of safe practice, including safeguarding and data protection policies or governance, but also provide no form of specialist support, or even knowledge of or referral pathways into local specialist services and partnerships arrangements, such as MARAC (Multi Agency Risk Assessment Conference).¹⁰ This leaves many survivors in unsafe accommodation with no access to local specialist domestic abuse or safeguarding support for themselves or their children.

Further examples highlighted by WAFE and Imkaan include inappropriately large providers, such as a 60 bed 'refuge' for women in Sunderland City Centre, which does not meet the definition of a refuge, as set out by the Department for Levelling Up, Housing and Communities (DLUHC) for the statutory duty on tier one local authorities to provide safe accommodation for survivors of domestic abuse which was introduced through the Domestic Abuse Act 2021.¹¹

Another case study provided by WAFE and Imkaan is a community interest company (CIC), Lotus Sanctuary, which is focused on 'ending homelessness', which created a new 40 bedspace hostel for women with complex needs in Middlesbrough in an unsafe area which is known as a hot spot for anti-social behaviour and is particularly dangerous at night. Lotus Sanctuary also stated that the support they provide to survivors of domestic abuse housed in their accommodation in Kirklees is limited to one hour per week, but that the women 'can ring if they need anything'.¹²

Birmingham and Solihull Women's Aid has also shared evidence of issues with exempt accommodation providers in Birmingham, where there has been a particular growth in this

⁶ [National standards 2019 \(edited 2021\) \(womensaid.org.uk\)](https://www.womensaid.org.uk)

⁷ [WELSH WOMEN'S AID National QUALITY STANDARDS FOR SERVICES SUPPORTING SURVIVORS OF DOMESTIC Abuse \(welshwomensaid.org.uk\)](https://www.welshwomensaid.org.uk)

⁸ [Commissioners Pack Single Parts.indd \(netdna-ssl.com\)](https://www.netdna-ssl.com)

⁹ <https://www.insidehousing.co.uk/news/news/urgent-concerns-over-exempt-accommodation-providers-targeting-domestic-abuse-survivors--69797>

¹⁰ Women's Aid and Imkaan, "Concerns with Exempt Accommodation for Survivors of Domestic Abuse." Women's Aid, Imkaan, 2021, [Online]. Available: Unpublished

¹¹ [Delivery of support to victims of domestic abuse in domestic abuse safe accommodation services - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

¹² Women's Aid and Imkaan, "Concerns with Exempt Accommodation for Survivors of Domestic Abuse." Women's Aid, Imkaan, 2021, [Online]. Available: Unpublished

type of accommodation in recent years,¹³ with now more than 22,000 people housed in non-commissioned exempt accommodation in the city.¹⁴ An evaluation of Birmingham Solihull Women's Aid's services by Thea Raisbeck, including their Housing Options Hub which provided support to a number of women seeking alternative accommodation due to poor quality exempt provision, concluded that due to the lack of safe, appropriate and specialist accommodation, single women and women with children are often being forced into inappropriate situations.¹⁵ Staff at Birmingham and Solihull Women's Aid cited examples of exempt providers contacting perpetrators, evicting women out who were in violent relationships as a consequence of being in inadequately supervised mixed-sex provision or of landlords potentially replicating controlling and abusive behaviours.

One example from Crisis shows the additional risk of violence faced by already traumatised victims and survivors in one exempt accommodation provider:

Lauren has been living in exempt accommodation in Birmingham since June 2020. A 30-year-old former salon manager, she lost her flat after being forced to stop work due to chronic back pain and anxiety caused by domestic abuse.

She said "The treatment I've had in these properties has been disgusting. In one I had a workman come into my room unannounced while I was dressing. He told me I'd "regret it" if I reported it to the police, while the office manager just told me not to worry about it and he'd buy me a pizza. I left another to sleep in a tent in the park after I had people high on drugs banging on my door asking me to come out. I've been violated, ignored, assaulted, and rejected. It's pushed me to the limit: no one should be put through this."

Another survivor of domestic abuse housed in exempt accommodation in Birmingham described to Birmingham Live how she was forced to call the police in fear and considered jumping out of her window to get to safety from a man she was housed with who was banging violently on her door.¹⁶

Failure to implement basic safeguarding and safety procedures for survivors of domestic abuse demonstrates a significant failure in the duty of care to residents and could significantly increase the risk to the victim/survivor. Shocking cases in recent years have seen potentially preventable homicides take place in exempt accommodation. In Northampton, one resident in exempt accommodation for people recovering from substance use was not risk-assessed by his provider before he stabbed his flatmate to death. In April 2020, Phoenix Netts was murdered by another resident in supported accommodation in Birmingham.

Recommendation: We share our partners' recommendations that greater oversight and regulation is necessary, as well as a review of definitions of care, support, and supervision in Housing Benefit regulations so that unsafe providers are unable to access Housing Benefit in the first place.

2. Is the current model of exempt accommodation financially viable, and does it represent value for money?

The exempt provisions in Housing Benefit regulations are being used by many specialist domestic abuse providers in a way that is financially viable and represents value for money. For example, some specialist domestic abuse providers will use the exempt provisions to cover the cost of rent and housing management, with the support element being

¹³ [Exempt from Responsibility? - Spring Housing](#)

¹⁴ [Inside Housing - News - Exempt accommodation claimants in Birmingham double to 22,000 in three years](#)

¹⁵ [BSWAID-places-of-safety-report.pdf \(birmingham.ac.uk\)](#)

¹⁶ [Chaos, fear and suicide attempts - life inside 'exempt' housing in Birmingham - Birmingham Live \(birminghammail.co.uk\)](#)

commissioned by the local authority or the Police and Crime Commissioner. Others may fund the support element through their own fundraising, for example using funding from trusts and foundations or individual donations. Our National Group Partners, including the Domestic Abuse Commissioner, are not aware of any specialist refuges which rely entirely on the higher rate of Housing Benefit to cover the cost of the specialist support they provide.

However, our National Group partners, including WAFE, are greatly concerned by the lack of regulation and guidance around the use of these financial provisions which some housing providers have capitalised on to claim Housing Benefit for exempt accommodation and establish unsafe and poor-quality supported housing for women and children experiencing domestic abuse. We are aware of some cases of private companies establishing Companies (CICs) to do so, with the purpose of delivering financial return to investors, rather than supporting survivors of domestic abuse and other vulnerable people they house¹⁷. As their 'business model' relies on claiming higher levels of Housing Benefit, these providers are often focused on minimising their voids rather than working towards recovery and resettlement and have little organisational ambition to move people on to more sustainable long-term accommodation.

Recommendation: We reassert our recommendation that greater oversight and regulation is necessary, as well as a review of definitions of care, support, and supervision in Housing Benefit regulations so that unsafe providers are unable to access Housing Benefit in the first place.

3. Are there significant geographical and regional differences in the provision and the problems of exempt accommodation?

Not answered

4. What is the proportion of exempt accommodation that is provided by registered compared to non-registered providers, and is an appropriate balance being struck?

Not answered

5. What is the proportion of exempt accommodation provided by commissioned compared to non-commissioned providers, and is an appropriate balance being struck?

Not answered

6. How does whether a provider is registered or non-registered, or commissioned or non-commissioned, impact the quality of provision?

The National Group maintains the Domestic Abuse Commissioner's strong recommendation of caution in putting forward any recommendations which take a broad-brush approach to restricting accommodation which is non-registered or non-commissioned. Any such measures are likely to disproportionately impact specialist 'by and for' domestic abuse services which are far less likely to be commissioned or be connected to a registered provider of social housing.

¹⁷ [Add research source if possible](#)

Statutory Guidance for Part 4 of the Domestic Abuse Act on the provision of support within safe accommodation, as well as Home Office Guidance such as the VAWG National Statement of Expectations is clear that victims and survivors of domestic abuse with protected characteristics, such as Black and minoritised victim, LGBT+ victims and deaf and disabled victims, are best served by specialist 'by and for' services, which are run by highly specialist staff, whose work is designed to meet their specific needs. These services have developed, in consultation with victims and survivors, wrap around holistic support to meet the distinct intersectional needs of victims and survivors with protected characteristics.

Despite the value they bring, these specialist services are small, limited in number and capacity, and often face significant funding precarity. Initial findings from the Domestic Abuse Commissioner's research to map the provision of domestic abuse services in England and Wales shows that specialist 'by and for' services were far less likely to be in receipt of statutory funding than other organisations. Imkaan's research has also found that a random sample of 10 England-based, non-BME leading VAWG organisations received 39.6% of their funding from local authorities, compared to 10.9% of the funding for BME organisations surveyed. The Commissioner has also heard from Imkaan that none of their members are registered providers of social housing and noted that the process of becoming a registered provider takes significant time and resources, which would create additional burdens for already overstretched, under-resourced services.

Recommendation: The National Group maintains the Domestic Abuse Commissioner's strong recommendation of caution in putting forward any recommendations which take a broad-brush approach to restricting accommodation which is non-registered or non-commissioned

7. How should exempt accommodation be provided and what should the service cost?

A recent report by Prospect Housing finds that at least £816m has been spent on exempt accommodation in the last financial year alone.¹⁸ Previous research suggests that the rise in exempt accommodation has taken place in the context of increasing need for support for people at risk of or facing homelessness, and increased scarcity of this provision.¹⁹ Lifesaving accommodation-based domestic abuse services such as refuge have faced chronic underfunding which has particularly affected specialist by and for services for Black and minoritised, LGBT+, and deaf and disabled survivors of domestic abuse. The National Group welcomes transformative changes to address this introduced by the DLUHC through Part 4 of the Domestic Abuse Act which places a duty on tier one local authorities to commission domestic abuse support within safe accommodation. However, when there is a lack of a crucial mass of service users within a defined geographical area, the commissioning structure often discourages specialist by and for services from applying. The commissioning of one single service often means that specialist by and for services are ineligible to apply.

Recommendation: We share the Domestic Abuse Commissioner's recommendation that any savings because of regulatory reform of this sector should be redirected to improving the availability of specialist supported accommodation for vulnerable people, including dedicated funding for specialist accommodation-based domestic abuse services, particularly specialist by and for services for Black and minoritised, LGBT+, and deaf and disabled survivors.

¹⁸ [PRO Lesson-Learnt-report_October2021_FV.pdf \(campbelltickell.com\)](#)

¹⁹ [Exempt-from-Responsibility-Full-Report-November-2019.pdf \(commonwealhousing.org.uk\)](#)

8. How should the regulatory oversight of exempt accommodation be organised? What should be the regulations governing exempt accommodation and how should those regulations be enforced?

Existing research on exempt accommodation demonstrates that the lack of regulatory clarity has contributed to dangerous interpretations of the regulations, and resulted in landlords or providers claiming excessive rents, whilst providing poor accommodation and/or little to no 'care, support or supervision'.²⁰ To achieve the ambition of the landmark Domestic Abuse Act 2021²¹, it is critical that all services for survivors of domestic abuse, are delivered by expert staff and rooted in evidence-based training and recognised quality standards.

Whereas Registered Providers are accountable to several regulatory bodies, there is currently no formal oversight mechanism for exempt accommodation. For instance, Registered Providers are monitored by the Homes and Communities Agency and the support delivered by providers are subject to the standards set by local commissioners, sector-led accreditation schemes or formal regulators such as the Care Quality Commission. In sharp contrast, the range of providers currently eligible to deliver exempt accommodation – including community interest companies (CICs), charities and voluntary organisations – are not monitored by any formal oversight mechanism. The Government sought to address this through the publication of the National Statement of Expectations (NSE) for Supported Housing in November 2020.

The National Group welcomes DLUHC's roll out of five pilots, aimed at 'improving quality; enforcement; oversight; and value for money' in short-term, non-commissioned exempt supported accommodation.²² However, we feel that it was a missed opportunity to focus explicitly on domestic abuse to develop an evidence-based and survivor-led model for exempt accommodation. The NSE for Supported Housing's 'vision for accommodation standards, quality and value for money'²³ will not be achieved without establishing robust mechanisms which set out formal requirements for the provision of exempt accommodation. The NSE for Supported Housing therefore needs to be consolidated with stronger directives to local authorities to ensure that the 'expectations' for quality service provision are met by all providers of exempt accommodation. The Home Office's commitment to revising the NSE's for VAWG provides an opportunity to that there is a consistent approach to quality standards across the commissioning landscape for domestic abuse support. We therefore share WAFE's recommendation that DLUHC:

Recommendations:

- **Issue a specific directive to local authorities to withhold enhanced housing benefit from providers of specified or exempt accommodation targeting women experiencing domestic abuse where:**
 - **they are making profit, or there is evidence of a connection with profit making organisations.**
 - **where survivors or local specialist services providers raise safety concerns.**
 - **or where they have no experience of or can evidence safeguarding or risk assessment in cases of domestic abuse.**

²⁰ Spring Housing Association, Exempt from Responsibility: Ending Social Injustice in Exempt Accommodation Research and Feasibility Report for Commonwealth Housing, 2019. Available at: <https://springhousing.org.uk/news/exempt-from-responsibility/>

²¹ [Domestic Abuse Act 2021 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2021/51/section/1)

²² [CBP-9362.pdf \(parliament.uk\)](https://www.parliament.uk/business/committees/committees-a-z/commons-select/committees/a-z-committees-table/)

²³ <https://www.gov.uk/government/publications/supported-housing-national-statement-of-expectations/supported-housing-national-statement-of-expectations>

- **Strengthen both the National Statement of Expectations for Supported Housing and National Statement of Expectations for VAWG to enable local authorities to address unsafe and dangerous housing provision.**
- **Ensure that the findings from the exempt accommodation pilots in Birmingham, Bristol, Blackburn, Hull, and Blackpool inform changes to the NSE on Supported Housing and NSE on VAWG, in consultation with specialist domestic abuse organisations.**

It is important to recognise that the quality and regulation of Supported Housing provision is further undermined by the weak definitions underpinning The Housing Benefit and Universal Credit (Supported Housing) (Amendment) Regulations 2014.²⁴ The legislation introduced a new definition of ‘Specified Accommodation’ to ensure housing costs funding would not be negatively impacted by welfare reforms. This included ‘exempt’ accommodation alongside three other categories: Supported Housing where a third party (not the landlord) provides the care, support, and supervision; local authority hostels; and domestic violence refuges. However, within this definition, there remains no clear definition of care, support or supervision, and no specification about how much care, support or supervision needs to be provided, other than it must be more than ‘minimal’.²⁵

The National Group welcomes the recommendation in the statutory guidance for the new statutory duty in the Domestic Abuse Act 2021 that the delivery of support must meet agreed and recognised quality standards, and where they do not, encourage action is taken to ensure commissioned services align with these²⁶. This statutory guidance also makes clear that other forms of domestic abuse emergency accommodation must be tied to domestic abuse support.²⁷ However, through National Group partner, Women’s Aid’s monitoring of the implementation of the statutory duty, their research suggests that there is broad variation across the country in how local authorities and Police and Crime Commissioners (PCCs) interpret the new guidance. Therefore, without explicit directives prohibiting the use of statutory funding for exempt accommodation, many local areas will continue to fund unsafe and dangerous accommodation for survivors of domestic abuse. We therefore recommend that DLUHC:

Recommendation: Revise the Regulations to specifically exclude providers that do not meet recognised quality standards; do not provide single sex, secure spaces; and do not deliver dedicated support to survivors of domestic abuse, from the definition ‘other forms of emergency accommodation’.

9. What should be the regulations governing exempt accommodation and how should those regulations be enforced?

The domestic abuse sector has raised long standing concerns with the DLUHC and the Department for Work and Pensions (DWP) about the lack of clarity in the exempt accommodation regulations, which has resulted in poor quality, potentially dangerous accommodation and limited to no ‘care, support or supervision’ provided to survivors of domestic abuse housed in this accommodation. Existing research on exempt accommodation also demonstrates that the lack of regulatory clarity has resulted in providers claiming

²⁴ <https://www.legislation.gov.uk/uksi/2006/213/regulation/75H/2015-11-03?view=plain>

²⁵ DWP and DHCLG, Supported accommodation review The scale, scope and cost of the supported housing sector, 2017

²⁶ Delivery of support to victims of domestic abuse in domestic abuse safe accommodation services - GOV.UK (www.gov.uk)

²⁷ Domestic abuse support in safe accommodation statutory guidance and regulations: consultation response - GOV.UK (www.gov.uk)

excessive rents, whilst providing poor accommodation and very limited 'care, support or supervision'.²⁸

Recommendations:

The DWP should undertake a comprehensive review of Housing Benefit regulations to ensure greater clarity on the level of 'care, support and supervision' required to house victims and survivors of domestic abuse and other vulnerable groups. The reviewed regulations should specifically exclude from the definition of 'other forms of emergency accommodation' any provider that does not meet recognised quality standards for supporting victims and survivors of domestic abuse. Relevant safe accommodation for survivors of domestic abuse is specified by the Secretary of State in regulations as:

- **Refuge accommodation – a refuge offers single gender or single sex accommodation and domestic abuse support which is tied to that accommodation. The address will not be publicly available. Victims, including their children, will have access to a planned programme of therapeutic and practical support from staff. Accommodation may be in shared or self-contained housing, but in both cases the service will enable peer support from other refuge residents.**
- **Specialist safe accommodation – specialist safe accommodation offering single gender or single sex accommodation, alongside dedicated domestic abuse support which is tailored to also support those who share protected characteristic(s) and / or who share one or more vulnerabilities requiring additional support. Accommodation may be in shared or self-contained housing, and the address will not be publicly available.**

The DWP and DLUHC should also issue guidance to local authorities on assessing housing benefit claims. This should include specific direction on benefit claims for services seeking to offer accommodation to victims and survivors of domestic abuse. This guidance should specify that enhanced housing benefit should not be provided to inexperienced providers targeting victims of domestic abuse. An outline of the expertise and capacity required among providers should be provided in line with the definitions of 'relevant safe accommodation' and quality standards provided by DLUHC in the Domestic Abuse Act Part 4 regulations and guidance.²⁹

10. Is there sufficient publicly available information about exempt accommodation?

Not answered.

²⁸ Spring Housing Association, Exempt from Responsibility: Ending Social Injustice in Exempt Accommodation Research and Feasibility Report for Commonweal Housing, 2019. Available at: <https://springhousing.org.uk/news/exempt-from-responsibility/>

²⁹ *ibid*