

Andy Bates
Executive Committee
Labour Housing Group

31 January 2023

Dear Andy,

We are writing to you as a representative of the Labour Housing Group to introduce ourselves and respond directly to your request for input into the Labour Party Manifesto from a domestic abuse and housing perspective, and to invite you to meet our group to discuss how we can support to ensure Labour's manifesto delivers for survivors of domestic abuse.

We are the [National Housing and Domestic Abuse Policy and Practice Group](#), led by the [Domestic Abuse Housing Alliance \(DAHA\)](#). Our group was established in 2018 and brings together experts from the housing, domestic abuse, and violence against women and girls' (VAWG) sectors to share best practice and influence policy and practice that impacts on the safety and housing security of survivors of domestic abuse in England and devolved authorities.

Why domestic abuse is a significant housing issue

By its very nature domestic abuse is a housing issue, directly impacting on a survivor's right to a life free of violence and abuse and the right to a safe and stable home. This is because:

- Perpetrators create a context of fear and curtailed freedom usually within the home, a place where women and children should feel safe¹, and is tragically, where a victim of domestic abuse is most likely to be killed by her abuser².
- 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 their housing situation and concerns about future housing, including fears of homelessness or lack of safe housing, prevented them from leaving an abuser, which forces survivors including children, to remain in dangerous, traumatic, and life-threatening circumstances with the perpetrator.³
- Many victims and 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, including gatekeeping and local connection tests and the loss of secure social housing⁴.
- 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

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

² 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

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

⁴ Bowstead, J.C. (2022) 'Journeyscapes: the regional scale of women's domestic violence journeys', *People, Place and Policy*, 16(3), pp. 219–235. <https://doi.org/10.3351/ppp.2022.8332428488>. Available at: <https://extra.shu.ac.uk/ppp-online/journeyscapes-the-regional-scale-of-womens-domestic-violence-journeys/>

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

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.

Our three manifesto priorities

Based on our shared understanding of the housing needs and issues faced by survivors of domestic abuse, we have suggested three priority areas for the Labour Housing Group to put forward for inclusion in the Labour Party Manifesto. It is important to note that the chronic undersupply of social housing is intrinsically linked to all these priority areas, and without addressing this, it will be impossible to fully address the housing needs of survivors of domestic abuse.

- 1. Joint Tenancies:** Where survivors of domestic abuse share a joint tenancy with their abuser, it is legally complex and expensive to maintain their tenancy and home when separating from their abuser, and many are often forced to become homeless as a result. Therefore, to prevent survivors becoming homeless due to domestic abuse and to place the burden of leaving on those causing harm, we worked with members of the House of Lords to add an amendment to the Domestic Abuse Act 2021 during its bill stages to simplify the legal process for removing a perpetrator from a joint secured or assured social tenancy. While the amendment was not added to the bill, the Department for Levelling Up, Housing and Communities (DLUHC) published a consultation on joint tenancies and domestic abuse in May 2022. We provided our comprehensive response⁶ to the consultation yet are still awaiting the government's response. Since this time, both Scotland and Wales have passed legislation that improves the legal options for survivors of domestic abuse to maintain their tenancy while the perpetrator is removed, and we would hope that this has set a strong precedent for the UK Government to follow. We encourage you to read our briefing⁷ and question and answer document⁸ for more information.

Therefore, we ask the Labour Party to include within their Manifesto a commitment to supporting survivors who share a joint secure or assured social tenancy with their abuser, so that survivors can maintain their tenancy and their home, while placing the responsibility of leaving on perpetrators of abuse.

- 2. Priority Need & Local Connection:** After significant campaigning from this group and VAWG sector partners, victims of domestic abuse were given automatic priority need if they are homeless because of their experience of domestic abuse through the Domestic Abuse Act 2021. Despite these legislative changes, there is a growing body of evidence of continued gatekeeping from some local authorities, preventing survivors from being given priority status and accessing immediate safe accommodation and ongoing services and support. National Group member, Refuge, shared that many women across the country are still facing gatekeeping from housing officers, and are denied access to support and accommodation. This is the most common issue Refuge's National Domestic Abuse Helpline staff encounter. Many survivors face additional barriers from local authorities who continue to also apply a local connection test when allocating social housing, against statutory guidance, which disqualifies a significant proportion of survivors who must flee to an unknown area to become

⁶ National Group Response to Consultation on Joint Tenancies & Domestic Abuse: https://www.dahalliance.org.uk/media/11112/daha-national-housing-and-da-group_joint-tenancies-consultation-response.pdf

⁷ Briefing on Joint Tenancies and Domestic Abuse: https://www.dahalliance.org.uk/media/11115/joint-tenancies-domestic-abuse-briefing_may2022.pdf

⁸ Joint tenancies & Domestic Abuse Question & Answer Document: https://www.dahalliance.org.uk/media/11114/joint-tenancies-domestic-abuse-qa-doc_may2022.pdf

safe. We have responded to the Government's consultation on local connection tests and domestic abuse⁹, and have called for government to make a statutory exemption for survivors of domestic abuse (and all survivors of VAWG), and the regulation of the implementation of these statutory connection, priority need and local connection tests, but there has been no subsequent action from the Government to address this significant barrier for survivors made homeless due to domestic abuse

Therefore, we ask the Labour Party to include in the Manifesto a commitment to support local authorities to implement the automatic priority need to survivors of domestic abuse, and to make a statutory exemption for survivors of domestic abuse from local connect or residency requirements as part of their qualification criteria for applicants of social housing.

- 3. A gender informed homelessness pathway:** We share the concerns raised by the Ending and Preventing Women's Rough Sleeping sub-group of the Life off the Streets programme, who wish to highlight a pressing and high-risk equalities issue within the current rough sleeping response. It is well documented that domestic abuse is one of the leading causes of homelessness amongst women. There is also a strong body of qualitative data, as well as compelling new quantitative data, which demonstrates that women's rough sleeping is significantly under-represented in current statistics, and current provision is failing to address and provide for women's rough sleeping. Women sleeping rough carry the added burden of gender-based violence and abuse before, during, and after their time on the streets. Hiding from harm can mean that women are hidden from support services and missing from homelessness statistics. For many the only offer off the streets is to go into mixed accommodation, where women may continue to be exposed to male violence and abuse. Without identifying and responding to women's experiences of rough sleeping as distinct from men, which requires a distinct response, we will not end rough sleeping.

Therefore, we ask the Labour Party to include in the Manifesto a commitment to recognise and respond to women's rough sleeping as a distinct and urgent problem which requires a distinct and urgent response, if the wider ambitions to end rough sleeping for good are to be realised. This must include gender informed homelessness pathway and women-only accommodation offer across the country.

The social housing crisis

It would be remiss not to conclude that these housing needs and issues are inextricably linked to the crisis of a significant lack of social housing. It is the fundamental problem from which many of these complex housing issues arise, and changes to joint tenancies and local connection, for example, while welcome in themselves, will be limited without genuinely committing to a new generation of socially rented homes.

We have witnessed a significant proportion of survivors forced to give up secure social tenancies and accept accommodation with the private rented sector (PRS), which is often unaffordable, insecure, and

⁹ National Group Consultation Response on local connection and domestic abuse: <https://www.dahalliance.org.uk/media/11113/daha-national-housing-and-da-group-local-connection-consultation-response.pdf>

even discriminatory towards vulnerable tenants, particularly in London, due to a shortage of social housing stock. The impact on survivors' economic and housing security is profound and long term.

There are now over a million households on the official social housing waiting lists. However, the National Housing Federation's [People in Housing Need](#) report in 2021 stated that the number of people in need of social housing in England has reached 4.2 million, which equates to 1.6 million households, significantly more than on the official waiting lists. In 2021-22, only around [7,500 new social rent homes were built, a decline from 37,700 in 2011-2012](#). There is wide consensus based on a strong evidence base that we need 90,000 homes for social rent every year for the next fifteen years just to address need¹⁰, which will require considerably more government funding than is currently allocated within the AHP.

Therefore, in addition to our specific recommendations for responding to domestic abuse as a housing issue we recommend:

- 1. A commitment to building 90,000 new socially rented homes a year. This includes sufficient family-size homes.**
- 2. A commitment to create a dedicated fund for delivering a variety of affordable housing tenures for domestic abuse victims-survivors, including homes for single people and families, with relevant security measures in place. This will offer people a route out of abuse, and options for long term good quality homes that are safe. In turn reducing the burden on local authorities. We recommend this includes a commitment from Government to have a set annual target to deliver these homes, and publicly publish outcomes on an annual basis.**

An invitation to meet

Our group would welcome the opportunity to discuss these policy priorities with you in more detail. Please contact our Chair, Deidre Cartwright to arrange 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
- Generation Rent
- Gentoo Housing Association
- 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)

¹⁰ Crisis, Housing supply requirements across Great Britain: [crisis_housing_supply_requirements_across_great_britain_2018.pdf](#)