

Ministry of Housing, Communities and Local Government's Social Housing Green Paper

Response from National Housing and Domestic Policy and Practice Group

November 2018

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



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:

- DAHA
- Women's Aid
- AVA
- Homeless Link
- Chartered Institute of Housing (CIH)
- Surviving Economic Abuse (SEA)
- National Housing Federation (NHF)
- Shelter
- Crisis
- Stonewall Housing
- Resolve ASB
- Agenda
- Safelives
- Respect
- St Mungo's
- National Federation of ALMO's
- Refuge

Summary of consultation response and recommendations:

- The key principles underpinning the government's approach to delivering a secure future for those living in social housing must uphold the safety and security of accommodation and tenancy for those experiencing and fleeing domestic abuse.
- Survivors of domestic abuse fleeing their homes who previously had secure lifetime tenancies should retain secure tenancies when accessing new social housing.
- Specialist training on domestic abuse for all local authorities, housing associations and other social housing landlords and housing officers. Up to date resources and information about local specialist services and where to signpost tenants and staff experiencing domestic abuse must be held by all social housing landlords.
- For all housing providers to be encouraged and supported by government to take up DAHA accreditation to improve the whole housing sector response to domestic abuse
- Ensure cases of domestic abuse are correctly identified and not conflated with anti-social behaviour - which can lead to people being evicted and penalised unfairly and that an appropriate separate domestic abuse policy is in place to guide landlords on how to respond to domestic abuse and signpost to specialist services.
- Consider the creation of a key performance indicator for social housing landlords on the response to domestic abuse, as well as on the response to anti-social behaviour, and work with our group to

design how to ensure the indicator will capture the response that survivors are receiving from their landlords.

- Ensure that social housing is considered as one core part of a **‘whole housing approach’** to domestic abuse and that all areas of housing can identify and respond to domestic abuse at the earliest possible point. (see appendix for diagram)
- Recognise that housing is an economic resource which may be manipulated by perpetrators of abuse and that issues around access to housing can be an economic barrier to leaving in line with the inclusion of economic abuse within the new statutory definition of domestic abuse proposed by the Domestic Abuse Bill as well as cross-governmental work on violence against women and girls
- Recognise the role of supported housing in providing specialist housing and support to vulnerable people experiencing domestic abuse who also need support for other complex needs, including mental health and substance use, and ensure that any reform to the regulatory system for social housing should be undertaken with awareness of the simultaneous review of the oversight of supported housing.
- Provide clarity on the proposals outlined in the Ministry of Housing, Communities and Local Government consultation, *Improving Access to Social Housing for Victims of Domestic Abuse*, in relation to exemptions from residency requirements and expanding reasonable preference categories to include victims of domestic abuse.

Chapter 1: A safe and decent home which is fundamental to a sense of security and our ability to get on in life

Question 4: Do we need additional measures to make sure social homes are safe and decent?

We know that many women living in social housing will be at risk of, or experiencing domestic abuse. As domestic abuse and other forms of violence against women and girls (VAWG) typically occur within the home, social housing providers - and landlords, and local authority or housing association staff - are crucial in identifying and responding to domestic abuse, and delivering appropriate safeguarding and support. We welcome the review of the Decent Homes Standard and would encourage government to consider whether additional measures related to the prevention, identification and response to domestic abuse could be included so that social housing is safe for survivors.

Too often women and children fleeing abuse can face years moving between forms of temporary accommodation, waiting for social housing, or in homelessness. This can have highly damaging impacts on survivors and can impede recovery from trauma. Access to safe housing is a key priority for survivors and factors strongly into their decision making around whether to stay in, or leave, an abusive partner. Conversely, women can be at their most vulnerable following separation and most domestic homicides occur at the victim’s home – 75% of the 113 women who were killed by men in 2016 were killed in their own homes or the home they shared with the perpetrator and over three quarters of the 24 women killed post-separation were killed in the first year after the relationship endedⁱ.

Appropriate and safe early intervention, support and enforcement around housing options and tenancy issues are critical in helping to identify, safeguard and support those at risk of domestic abuse. It is also critical for reducing the burden of domestic abuse upon social housing providers; research by the Gentoo Group found that approximately 13% of repair jobs, and 21% of all repair costs, between 2015 and 2017 were potentially related to domestic abuse, costing the housing association an estimated £8.4 million. Households where domestic abuse is identified were estimated to have roughly £400 more repair costs than the “average” Gentoo household, demonstrating the clear financial cost incurred by housing providers from this form of crime.ⁱⁱ Early, effective action to identify, prevent and tackle domestic abuse helps to generate savings within the social housing sector.

There are also well-known links between domestic abuse and homelessness, with domestic abuse a strong precursor to experiences of homelessness and living on the street. St Mungo's research has shown that almost half of their female clients had experienced domestic abuse and a third (32%) of the women they work with said domestic abuse had contributed to their experiences of domestic abuseⁱⁱⁱ. The East London Housing Partnership, set up in 2014, funded by MHCLG and delivered by St Mungo's to provide supported accommodation to women sleeping rough identified that 73% of women had domestic abuse related support needs at the point of referral into the project^{iv}.

Research from the Women's Aid's No Woman Turned Away Project uncovered that of 404 women trying to access refuge accommodation, 11% had to sleep rough and 40% of women sofa-surfed.^v Furthermore, we know that women also make up a large proportion of the 'hidden homeless' population, where they may be sofa surfing with friends/acquaintances or being forced to enter into unsafe and exploitative living situations, such as 'sex-for-rent' terms.

The group remain concerned however, about the considerable variation in the response survivors receive from social housing providers - both local authorities and private registered providers (typically housing associations). Research by the Child and Women Abuse Studies Unit (CWASU) in 2014 found housing officers responding to survivors who "*were unsympathetic and seemed uninterested*" in the domestic abuse or "*alternatively did not understand and/or assumed that women lie.*"^{vi} The second year report from Women's Aid's No Woman Turned Away project found that of the 97 women who approached their local housing team for help, 52 women (53.6%) were prevented from making a valid homeless application on the grounds of domestic abuse. In 12 of these cases the housing authority did not consider the domestic abuse indicated the woman was 'priority need'; six women were refused help as they had no 'local connection', five women were told they were 'intentionally homeless' and shockingly, three women were told to return to the perpetrator."^{vii}

These inadequate responses have clear implications for the safety, and sometimes even lives, of survivors. We consider the review of the Decent Homes Standard an important opportunity to set out the essential requirements for social housing providers in protecting those experiencing, and seeking to escape, domestic abuse. Specialist training for all local authority and housing staff who are in contact with social housing tenants will be particularly vital for ensuring that domestic abuse is identified at the earliest possible point, the risk to the victim is identified, appropriate support and safeguarding measures are put in place, alternative housing options for perpetrators are sought – where the perpetrator is also a tenant - and victims are signposted to local specialist domestic abuse services and the National Domestic Violence Helpline, run by Women's Aid and Refuge, for additional support. Further information about the specific requirements of training are detailed in the response to question 39.

In 2014 [Peabody](#), [Gentoo](#), and [Standing Together Against Domestic Violence](#) created the [Domestic Abuse Housing Alliance \(DAHA\)](#). It brings together their combined best practice and is the UK benchmark on how the housing sector can improve their response to domestic abuse. It is underpinned by 8 priorities including policy and procedure, case management, risk management, partnership working, equality and diversity, staff training and publicity for customers in the support a housing provider can offer. DAHA were also funded in 2017 by the Home Office to create a free online toolkit which any housing provider can access [here](#).

In addition to the toolkit DAHA are running free workshops all over the UK to increase awareness and covers the 8 priority areas in more depth to support housing provider to attain accreditation.

At Peabody and Gentoo, two of the founding partners of DAHA, this approach has had a significant impact on reporting rates and understanding of domestic abuse and its dynamics. At Peabody over 9 years there has been an increase in reporting of 1425% and a new case is reported on average every 3 days. In

research undertaken by Safelives, Gentoo tenants accessed support from Gentoo's specialist team one year earlier than the national dataset (made up of specialist domestic abuse services) demonstrating the unique role that housing providers can have with their customers.

We are also concerned that survivors of domestic abuse are unable to retain secure lifetime tenancies if they are forced to flee their homes due to domestic abuse. Research by London-based Women's Aid member organisation Solace Women's Aid found that of the 121 women who entered their refuge services in 2015, 22% had a secure tenancy on arrival but only 13% were able to secure a secure tenancy on leaving the refuge^{vii}. The Secure Tenancies (Victims of Domestic Abuse) Act 2018 created legislation to protect survivors' access to secure tenancies, in light of the legislation to phase out lifetime tenancies through the Housing and Planning Act 2016. We welcomed the government's commitment to remedying this issue, however this legislation is now not being implemented due to the government's decision to no longer bring forward the wider reforms to ending secure tenancies. However, we know in practice that survivors fleeing secure tenancies are unable to retain to secure new lifetime tenancies when accessing new social housing.

Chapter 3: Empowering residents and ensuring their voices are heard so that landlords are held to account;

Question 12: Do the proposed key performance indicators cover the right areas? Are there any other areas that should be covered?

Domestic abuse and other forms of VAWG are not only issues of key importance, but of fundamental safety, to many residents living in social housing. A domestic abuse crime is committed every minute in England and Wales^{viii}, and just under a fifth of all households live in the social housing sector^{ix}. These are huge numbers of victims of domestic abuse living in social housing in recognition of this, and for social housing providers to deliver a safe and consistent response to domestic abuse, we recommend that a key performance indicator is focused on the response to this specific form of crime or domestic abuse is specifically named and covered in the indicator relating to responsible neighbourhood management.

The inclusion of tackling anti-social behaviour as part of the neighbourhood management indicator here, without reference to domestic abuse indicator, is concerning for the reasons set out in question 42. This indicator will need to encourage social housing providers and other landlords to take domestic abuse seriously and recognise the distinction between domestic abuse and other types of anti-social behaviour, or behaviours that can be considered anti-social behaviour but are driven by domestic abuse. It should also be able to monitor landlords' responses to safeguarding issues relating to domestic abuse and ensure that all social housing providers have a clear policy on domestic abuse, including how to support and signpost victims and deal with perpetrators.

Supported housing is a vital form of social housing which provides specialised housing and support to some of the most vulnerable people in society. This includes many vulnerable victims of domestic abuse and VAWG who also need support with other complex needs, including mental health and substance use. The MHCLG and DWP are currently working together and with providers, local authorities, membership bodies and resident representatives to "put together a sound and robust oversight regime" for supported housing. This coincides with the proposed review of performance standards and the role of the regulator set out in the Green Paper.

Oversight of supported housing should leverage off existing arrangements and not be burdensome on providers. Any reform to the regulatory system for social housing should be undertaken with awareness of the simultaneous review of the oversight of supported housing. There is a substantial amount of crossover between providers of the two, so we recommend that officials across departments work together to

review existing arrangements, and work with the sector to ensure the most effective and appropriate regulation and oversight is in place for both social housing and supported housing.

Question 14: Should landlords report performance against these key performance indicators to the Regulator?

The group agrees that a return to proactive regulation of consumer standards could be a positive step, to enable the regulator to determine which landlords are meeting the standards.

We know that landlords can have a major role to play in keeping survivors of domestic abuse safe and helping to deal with perpetrators. Assessing and reviewing how landlords are dealing with cases of domestic abuse is crucial to our wider understanding of how landlords are working with vulnerable tenants who require additional support. Being specifically assessed and reporting against these indicators will be a strong incentive for landlords to meet the requirements set out in the indicators and provide better support for victims on domestic abuse living in their properties.

Question 15: What more can be done to encourage landlords to be more transparent with their residents?

Best practice for how social housing landlords and providers should respond to domestic abuse is well established and the DAHA accreditation is a practical way for social housing providers to upskill staff and ensure they have an effective response to domestic abuse. All social housing providers and landlords must be making a clear commitment to protecting individuals experiencing domestic abuse, establishing a robust and transparent policy and procedure - which details the response residents will receive, and the support that will be provided and making details of these freely available to residents. This is also championed by the Make A Stand Pledge led by the Chartered Institute of Housing in Partnership with Women's Aid and DAHA. So far 252 Housing Providers have signed up to this. Robust monitoring and evaluation of social housing providers' responses to domestic abuse is of course an essential part of having transparent and effective policies and procedures, and ensuring implementation.

Providing information and undertaking awareness raising activities will also be essential, and must include: the support that residents experiencing domestic abuse can expect to receive from the provider; their rights in respect of domestic abuse - including their rights under the main homelessness duty, information on keeping their tenancy and dual housing benefit provisions -; enforcement action that will be taken against perpetrators; and information about local specialist services in the area who can provide help and support. This should be regularly updated and reviewed, to ensure that changes - such as MHCLG's proposals to improve access to social housing, published for consultation in 2017 - are communicated to residents.

Chapter 4: Tackling stigma and celebrating thriving communities, challenging the stereotypes that exist about residents and their communities;

Question 39: What is needed to further encourage the professionalisation of housing management to ensure all staff deliver a good quality of service?

We welcome the Government's commitment to improving the professionalisation of housing management, and ability of housing officers and other staff to deliver a high-quality service. The provision of specialist training on domestic abuse for housing staff - who are highly likely to work with survivors during their professional lives - is crucial. We do consider it important to recognise, however, that a 'customer service' approach will not always be appropriate or effective in responding to survivors of domestic abuse. All survivors require a high-quality response from housing staff, but the nature of this may need to differ significantly from a customer.

As 'frontline responders', housing officers need training on domestic abuse that covers:

- The nature and impact of domestic abuse and coercive control - including recognising and understanding power and control dynamics; perpetrator behaviours and tactics, and their intended purpose and aims; the impact on victims, their families and children; and trauma.
- How housing and finances can be used to perpetrate economic abuse within the context of domestic abuse and how this creates economic barriers to leaving and rebuilding lives;
- The links between housing, homelessness and domestic abuse - including coping strategies which may be viewed or classed as anti-social behaviour;
- Community attitudes - including recognising the normalisation of domestic abuse, distinguishing myth from fact, victim-blaming attitudes and how these can be overcome.
- Key duties and legislation in relation to housing and domestic abuse - including safeguarding, social housing and homelessness applications, and enforcement with perpetrators;
- Effective and safe practice within housing and domestic abuse including risk assessment, referral, safety planning, support work, holding perpetrators accountable, and multi-agency working.

This level of knowledge requires comprehensive training delivered by domestic abuse and housing specialists - who use interactive materials, real-life examples and case studies and exercises so that professionals gain an in-depth and evidence based understanding of the issue, and acquire the skills to respond. The strengths-based, needs-led, trauma-informed approach to identifying and working with survivors of domestic abuse, as modelled in the Women's Aid Change that Lasts^x programme, is widely accepted as best practice. This model of working should underpin the training of social housing professionals and landlords and should form the basis of policies and responses. Further information about requirements for training can be provided by Women's Aid's National Training Centre.

DAHA offer 'Safe at Home: Domestic Abuse Training for Housing Providers'. This training stems from a ground-breaking 2-year funded European Project which has produced best practice training for housing professionals. This training course is for anyone who works in housing, particularly those who aren't domestic abuse specialists. It will provide housing professionals with an understanding of domestic abuse as a social issue and its dynamics. It will also equip them with the skills to identify risk factors; report appropriately, implement an action plan in conjunction with the family's needs; and make appropriate onward referral to support services.

However, training is just one aspect of how a housing provider can improve their response to domestic abuse and therefore all housing providers should undertake DAHA accreditation which covers eight priorities areas, of which training is one of them. DAHA accreditation seeks to transform the whole organisational response to domestic abuse.

Training also needs to be supported by ongoing professional development, to ensure housing officers understand the range and changing obligations housing providers have in respect of domestic abuse and can support survivors of domestic abuse to access these rights. MHCLG's proposals to improve access to social housing for survivors' living in refuges, which were consulted on in December 2017, should be clarified and communicated in this regard.

[Question 42: How are landlords working with local partners to tackle anti-social behaviour? What key performance indicator could be used to measure this work?](#)

Whilst some women may choose or be forced to leave their homes in cases of domestic abuse to access refuge accommodation or other types of emergency accommodation, whether supplied by the local authority or friends/family, many women will want to stay in their own homes. In these cases, it is crucial that survivors have the option to stay at home safely with the ability to access help and support.

There are clear links and overlaps between perceived anti-social behaviours and domestic abuse. We know domestic abuse is often not being recognised in social housing scenarios and instead treated as nuisance behaviour; this confusion can have hugely damaging impacts, with victims being left in highly dangerous and vulnerable positions and perpetrators enabled to continue their abuse. Evidence suggests that incidents or repeated patterns of domestic abuse may often be treated as anti-social behaviour by landlords. Research carried out in Wales showed that 40% of tenants who identified as victims of domestic abuse had anti-social behaviour complaints made against them.^{xi} Victims of domestic abuse in this study were four times more likely to have been complained about by neighbours than other social housing tenants. Complaints against survivors of domestic abuse were mostly in relation to noise and nuisance

Research on the largest UK based survey to housing providers on domestic abuse found that a significant majority framed domestic abuse as a component of anti-social behaviour - 65% of survey respondents stating domestic abuse was situated within antisocial behaviour within the organisation and not as a stand-alone issue in its own right^{xii}. Responses to the research survey in this study highlight the inappropriate and dangerous conflation of anti-social behaviour and domestic abuse:

'We categorise Domestic Violence and Abuse as ASB - due to the neighbourhood impact.'

'We don't have a dedicated policy or procedure to deal with Domestic Abuse and currently view it as another element of anti-social behaviour.'

The classification of domestic abuse as anti-social behaviour is deeply problematic for victims of domestic abuse who will not be identified as experiencing domestic abuse or offered the appropriate support. In the most dangerous cases the misrepresentation of cases of domestic abuse as anti-social behaviour can lead to worse outcomes for victims of domestic abuse, who can be penalised for the abusive behaviour of their (ex) partner and face fines or other sanctions, or the threat of, or actual, eviction. Research has shown that 13% of all repair jobs and 21% of all repair costs across Gentoo's social housing stock were potentially related to domestic abuse. It was estimated that the cost of these repairs was £8.4m over two years^{xiii}.

It is critical that social housing landlords have an up to date policy on tackling domestic abuse. This policy should link to other policies on anti-social behaviour and harassment, but should clearly set out how domestic abuse is distinct from anti-social behaviour and should set in motion a different or enhanced range of measures and protections for the victims and should provide a clear pathway for how to remove the perpetrator from the home, if safe and appropriate to do so.

Housing must also have a comprehensive IT system that categorises and record DA properly. This is fundamental in being able to case manage effectively, ensuring referrals to local specialist services and MARAC's are made and to produce reports which could be added to national data set.

Safelives figures demonstrate that the national figures for referrals to MARAC from housing over the last 5 years remain low:

2013/14: 2.24%

2014/15: 2.82%

2015/16: 2.55%

2016/17: 2.14%

2017/18: 1.98%

We are also concerned that this could be because of the confusion between DA MARACs and the new Community MARACs which are becoming common place in London.

Chapter 5: Building the social homes that we need and ensuring that those homes can act as a springboard to home ownership.

The housing crisis is resonating across all areas of society and is hitting vulnerable tenants the hardest. Moreover, we know that women have been, and continue to be, bearing the brunt of cuts within the welfare system, such as the benefit cap and two child limit to tax credits. Amongst those women who are most impacted by both the housing crisis and austerity measures are victims and survivors of domestic abuse.

It is essential that victims of domestic abuse are not prevented from escaping abusive partners or rebuilding their lives after fleeing abuse by consequences of the housing crisis and welfare reform. At the moment, we are extremely concerned that many victims of domestic abuse are being faced by the awful reality of having to stay with a violent partner or leaving and facing extreme financial hardship and/or homelessness.

There must be enough truly affordable housing and social housing available so survivors of domestic abuse needing to move due to domestic abuse and those leaving a refuge or supported housing are able to truly benefit from the government's proposals^{xiv} to prioritise access to social housing for some of our most vulnerable women and children.

The availability of 'move on' accommodation for the 13,000 women and 14,000 children living in refuge every year^{xv} is a major challenge for the sector. Often moving women out of refuge accommodation into social housing is preferable to women (re)entering the private rented market at an extremely vulnerable and chaotic period on their life.

Social housing can also offer women with a history of rough sleeping or homelessness and domestic abuse the security, stability and affordability they need to move away from the streets permanently. A comprehensive study which followed hundreds of people for five years after homelessness found that people were much less likely to become homeless again if they moved into social housing rather than private rented housing.^{xvi}

As Women's Aid's research has shown 'lack of affordable and appropriate housing options is a major barrier to survivors' independence and recovery from domestic abuse. If they have no local connection to the area, accessing social housing can be very challenging'.^{xvii}

Frontline specialist workers said that due to vastly different interpretations of the law and guidance, gate-keeping behaviour and refusal to meet their obligations on the part of many local authorities, resulted in Refuge's specialist workers having to spend approximately half of their working hours helping women access appropriate housing and secure their housing entitlements. Frontline staff also reported that before assisting their clients to navigate the social housing system they had to 'prepare them for an inevitable battle' as securing entitlements to social housing is now almost always a long and difficult struggle.^{xviii}

Another key barrier to securing appropriate accommodation for women and children leaving refuges and those fleeing their homes, is the ability to retain a secure lifetime tenancy. The Housing and Planning Act 2016 ended periodic tenancies - "lifetime tenancies" - from being granted in the future, except in limited circumstances. It also removed the power to grant new flexible tenancies, with local authorities now required to grant shorter term "fixed" tenancies instead. Significant concerns were raised that these reforms risked further increasing the barriers facing victims in escaping an abusive home. Women's Aid won the commitment from government to bring forward the Secure Tenancies (Victims of Domestic Abuse) Act 2018 to ensure that that lifetime tenants in social housing who need to leave, or have left, their home to escape domestic abuse are granted a further lifetime tenancy in their new home when being re-

housed by a local authority. Further, Women's Aid supported amendments to the Act to ensure that women who had joint tenancies with the perpetrator of abuse against them were able to retain a secure lifetime tenancy if their abusive partner moved out or was removed from the property.

As set out in the government's green paper on the future of social housing, the provisions in the Housing and Planning Act to phase out lifetime tenancies will no longer be brought forwards. Whilst we welcome this move, we know that in practice it is very difficult for women fleeing abuse to secure a lifetime tenancy when moving to a new area, leaving a refuge or approaching their local authority to be rehoused or transferred. The group is urging the government to urgently bring forward further legislative provisions to end the post code lottery of access to secure tenancies and ensure no victim of domestic abuse loses their right to a secure home due to their experience of domestic abuse. This should be done at the earliest possible stage and at the latest through the forthcoming Domestic Abuse Bill.

The group also has a number of concerns about Universal Credit and the unintended consequences of survivors of domestic abuse. The design of Universal Credit risks exacerbating economic abuse for survivors, and poses an additional barrier to their ability to escape an abusive partner.

We share the concerns of the cross-party Work and Pensions Select Committee and the Home Affairs Select Committee that the single monthly payment may facilitate economic abuse, increasing a perpetrator's ability to control and abuse.

Women's Aid and the TUC's survey of survivors found that:

- Almost 70% of agreed that their partner would ask DWP to pay UC into their account;
- Almost 73% agreed that monthly payments could make financial abuse more likely;
- Over 58% agreed that monthly payments could mean they are more likely to get more behind with bills/rent and build up debt.

The Government recognises the risks of UC for survivors and have established an Alternative Payment Arrangement, 'split payments', to provide protection. The Home Affairs Committee cites evidence from Surviving Economic Abuse that the split-payment solution in situations of domestic abuse is fundamentally flawed since it has the potential to increase risk to victims. Applying for a split payment could be highly dangerous if a perpetrator finds out that a survivor has made an application, or has to set up a new bank account. 2018 showed that 'around 20' households had received a 'split payment'. As DWP is not collecting data on the numbers of applications made or refused, it is also not possible to assess how effectively 'split payments' are mitigating economic abuse and providing a robust solution for survivors. We welcome the Scottish Government's commitment to routinely separate UC payments between a household, rather than paying it to a single account, and call on the UK Government to implement the recommendations made by both the Work and Pensions and Home Affairs Select Committees for reform of UC to ensure it is safe for survivors. Swift changes - including paying the main carer of children the entire payment by default - would deliver real protection for survivors and their children now.

We have further concerns about payment schedules and waiting times, the process of managed migration onto UC, the Domestic Violence Easement and the capacity of Department for Work and Pensions staff and Jobcentre Plus staff to identify and respond to domestic abuse safely. Urgent reforms are needed to ensure the design of UC - and DWP's staff and systems - deliver the best possible protection for survivors. We recommend that the DWP accepts the Work and Pension's Committee's recommendations for reform in this area and takes action to:

- Monitor and assess the number of requests made for split payments, who they have been made by, and how many have been granted.

- Where claimants' have dependent children, ensure the entire payment is made to the main carer by default and deliver direct payments to landlords in cases of domestic abuse.
- Work swiftly with the Scottish Government to trial 'separate payments by default', and use this evaluation to determine whether this system should be implemented across the UK.
- Remove the requirement for women fleeing domestic abuse to a refuge to have to repay a benefit advance through UC.
- Extend the 13-week time frame for the DVE, scrap the time-limit on evidence and remove the requirement for survivors not to be living with a perpetrator to access the easement.
- Develop a specific training module for work coaches and ensure that staff in DWP, Jobcentre Plus and local authority teams administrating UC receive robust training on domestic abuse, coercive control and economic abuse – particularly in delivering safe routine inquiry, access to split payments and the DVE, and effective support and referral.

ⁱ Brennan, D (2017) The Femicide Census: 2016 Findings. Women's Aid & Nia.

ⁱⁱ Gentoo and Safe Lives, Safe at Home: the case for a response to domestic abuse by housing providers, 2018

ⁱⁱⁱ St Mungo (2014) Rebuilding Shattered Lives: <https://www.mungos.org/publication/rebuilding-shattered-lives-final-report/>

^{iv} Williams, M Women's Hidden Homelessness. Accessed online: <https://www.homeless.org.uk/sites/default/files/site-attachments/Article%20Womens%20Homelessness%20Nov%202017.pdf>

^v Smith, k and Miles C (2017) Nowhere To Turn: Findings from the First Year of the No Woman Turned Away Project. Women's Aid: Bristol.

^{vi} Kelly, L; Sharp-Jeffs, N & Klein, R. (2014) [Finding the Costs of Freedom](#) Child and Woman Abuse Studies Unit and Solace Women's Aid.

^{vii} Women's aid (2018) No Where To Turn 2018: Findings from the Second Year of the No Woman Turned Away project.

^{viii} Solace Women's Aid (2016) The Price of Safety: How the housing system is failing women and children fleeing domestic abuse. Solace Women's Aid: London.

^{ix} Her Majesty's Inspectorate of Constabulary, Fire and Rescue Services, [PEEL: police effectiveness 2017 - a national overview](#), March 2018

^x Ministry of Housing, Communities and Local Government, A New Deal for Social Housing: Green Paper, 2018

^{xi} <https://www.womensaid.org.uk/our-approach-change-that-lasts/>

^{xii} Jackson, Rebecca (2013) The Role of Registered Social Landlords in tackling domestic abuse in Gwent and the wider implications.

^{xiii} Henderson, K (2016) Coordinated Community Responses: Housing Providers and Domestic Abuse <https://n8prp.org.uk/coordinated-community-responses-housing-providers-domestic-abuse/>

^{xiv} Gentoo and Safe Lives, Safe at Home: the case for a response to domestic abuse by housing providers, 201

^{xv} As set out in the 2017 MHCLG *Improving Access to Social Housing for Victims of Domestic Abuse* consultation

^{xvi} Women's Aid (2018) Survival and Beyond: The Domestic Abuse Report 2017. Bristol: Women's Aid

^{xvii} Refuge's response to access to social housing consultation <https://www.refuge.org.uk/improving-access-to-social-housing-refuge-response/>

^{xviii} Kings College London (2016) Rebuilding Lives: Formerly homeless people's experiences of independent living and their longer term outcomes <https://www.kcl.ac.uk/sspp/policy-institute/scwru/pubs/2016/reports/RebuildingLives2016Report.pdf>

^{xix} Ibid.

Appendix 1 – Whole Housing

