

# Whole Housing Approach

**Year 2 Report**

**April 2019 to March 2021**

Published August 2021



Whole Housing  
Domestic Abuse



**A Whole Housing Approach to addressing the housing needs of victim/survivors across all tenure types, running across three pilot sites; Cambridgeshire, Stockton-on-Tees and three London Boroughs**

**Delivered in partnership with:**



Standing Together Against Domestic Abuse



Domestic Abuse Housing Alliance



Surviving Economic Abuse



Advance



Safer London



The Bobby Scheme



Stockton-on-Tees Borough Council



The Royal Borough of Kensington and Chelsea



Cambridgeshire & Peterborough Domestic Abuse & Sexual Violence Partnership



Hammersmith and Fulham



City of Westminster

**With thanks to the Ministry of Housing, Communities and Local Government for funding the Whole Housing Approach Pilot Project.**

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### A note on language

The term victim/survivor is used throughout this report to refer to people who have or are experiencing domestic abuse. The term perpetrator and abuser is used interchangeably throughout to refer to the person using abuse.

## What is a Whole Housing Approach?

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The Whole Housing Approach (WHA) is a framework for addressing the housing and safety needs of victim/survivors in a local area.

It brings together under one umbrella all the main housing tenure types alongside the housing options and support initiatives needed to help people experiencing domestic abuse to either maintain or access safe and stable housing. Central to the effective provision of a WHA is the role of the WHA Coordinator who ensures these initiatives are delivered in a safe, consistent, and coordinated way, alongside the role of specialist domestic abuse services who provide critical advocacy and support for victim/survivors in accessing these options and initiatives.

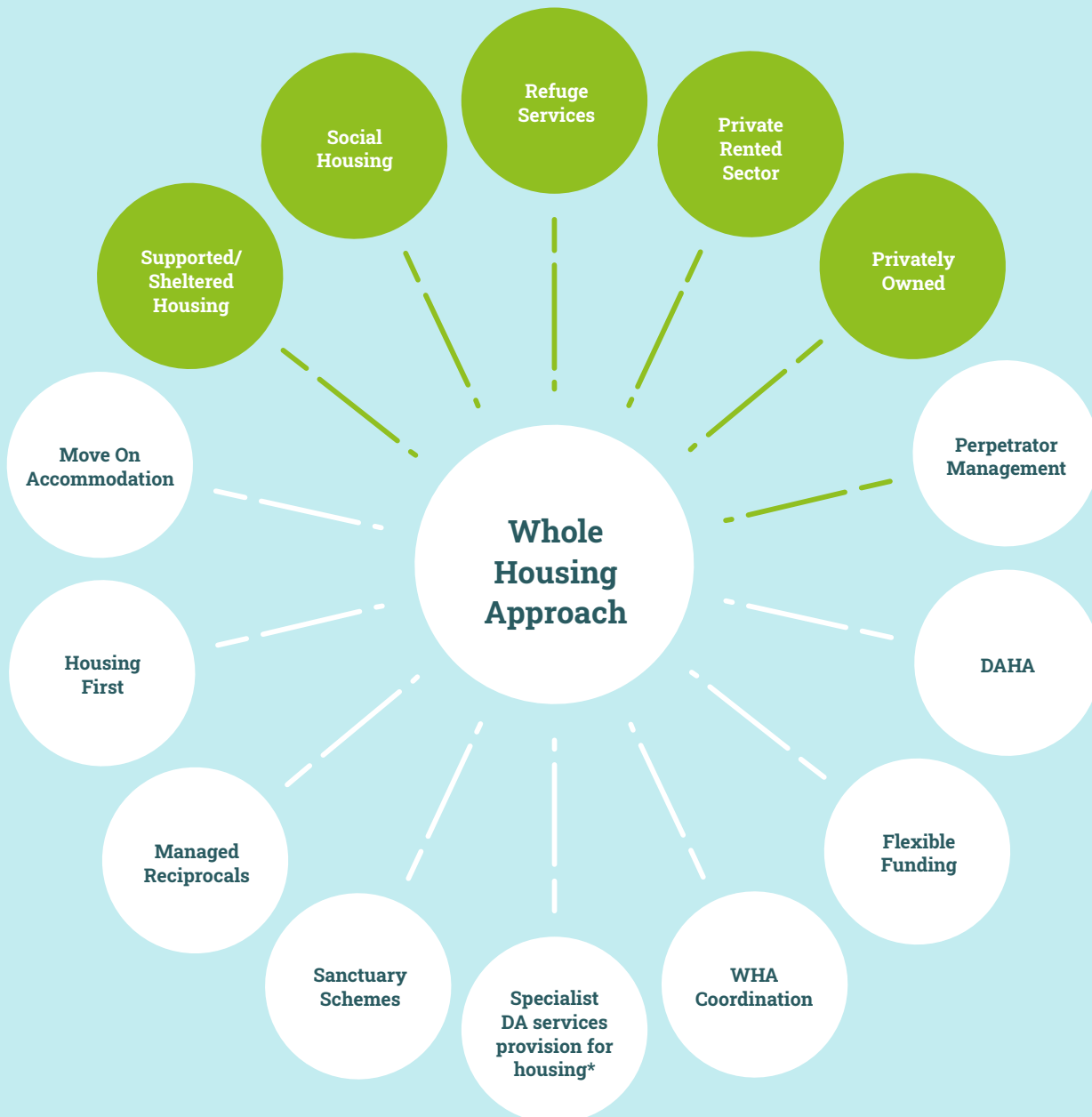
It currently includes 14 components that can be categorised into two parts as demonstrated in the diagram on the next page.

1. The green circles represent the main tenure types: social housing, the private rented sector, privately owned, supported/sheltered accommodation. Refuge Services are a dedicated domestic abuse service offering support attached to accommodation. This is highlighted in green as it offers victim/survivors a form of temporary accommodation.
2. The white circles represent the housing options, initiatives and domestic abuse support offered to victim/survivors within these tenure types, including: Co-Located Advocacy, Mobile Advocacy, Flexible Funding, WHA Coordination, Sanctuary Scheme, Managed Reciprocity, Move On Accommodation, Domestic Abuse Housing Alliance (DAHA) accreditation and Perpetrator Management.

**“There’s no place like home.”**

**Dorothy Gales**

**The WHA approach includes 14 components**



\*Mobile Advocacy and Co-Located Advocacy

## Key Aims

The WHA mission is to meaningfully address the safety and housing needs of victim/survivors, ensuring they can maintain or access safe and stable housing as quickly as possible. It achieves this with the following aims:

1

To bring together the housing and domestic abuse sectors through a Coordinated Community Response (CCR) to keep victim/survivors safe and hold abusers to account. Coordination efforts join up existing WHA components in a local area and work with key agencies and stakeholders to address any gaps. Victim/survivors voices and experiences should be at the heart and centre of a WHA partnership. As explained above, the role of the WHA Coordinator and specialist domestic abuse support services are crucial to the provision of a CCR and keeping victim/survivors' voices at the centre of the approach.

2

To create earlier identification and intervention for domestic abuse through raising awareness of and improving responses to domestic abuse with key housing agencies and stakeholders, including those working in privately owned and private rented sectors.

3

To reduce homelessness linked to domestic abuse by improving the options available and giving victim/survivors more choice to remain or relocate to a new property.

The WHA was first conceptualised in 2018 by the Domestic Abuse Housing Alliance (DAHA) in collaboration with the [National Housing and Domestic Abuse Policy and Practice Group](#).

This group brings together national domestic abuse and housing organisations and homeless charities operating in England. It creates space for the two sectors to learn from the other, find consensus and influence policy and practice. It is a collective voice for lobbying for change. One of its main functions is to respond to Government consultations. The group's submission to the Domestic Abuse Bill consultation in May 2019 included the call for a WHA to domestic abuse.

The WHA creates capacity for the domestic abuse and housing sectors to work together to address the immediate and longer-term housing needs of survivors. It incorporates the experiences of victim/survivors, the expertise of system leaders along with established, evidence-based practice, while exploring new ground in the private rented sector (PRS) and privately owned sector to identify how key agencies and stakeholders in these sectors can be part of an effective [Coordinated Community Response \(CCR\)](#) to domestic abuse.

The WHA endeavours to raise awareness of and improve responses to domestic abuse with all key housing services that play a vital role in meeting victim/survivors housing needs. It aims to establish a consistent set of bespoke housing options and initiatives in every locality, which gives victim/survivors greater choice over their housing situation, whether that is to remain in their existing home or relocate to a new one.

It considers the actions that can be taken against abusers/perpetrators, which should always start with the awareness, agreement, and involvement of victim/survivors.

It situates dedicated and by and for domestic abuse services at the centre of the approach, recognising their expertise and reputed role as a key independent advocacy and support service for victim/survivors. It also ensures effective coordination and collaboration between all options and initiatives and stakeholders related to each tenure types through the role of a WHA Coordinator. This role focuses on facilitating and oversees the formation and sustainment of a local WHA partnership, which exists as part of a local area's existing CCR governance structure to domestic abuse or violence against women and girls (VAWG) partnership.

To date, the focus on the housing needs of victims/survivors has been on social housing. A WHA embarks on new and innovative work, exploring the experiences, barriers and needs of survivors in the three main tenure types. We are learning from the pioneering work being delivered at the second tier in the private rented sector (PRS) and private ownership sector how perpetrators are using housing in these contexts as part of their abuse to destabilise a victim/survivors' housing situation, further restricting their space for action and choices. We are also discovering new ways of tackling this, working together and alongside stakeholders involved in these sectors and connecting them with the local CCR response.

The WHA addresses victim/survivors' experiences of economic abuse, which is now recognised in the Domestic Abuse Act and refers to when an abuser may 'restrict, exploit and sabotage the victim/survivors' access to money and other resources such as food, clothing, transportation and a place to live'.<sup>1</sup> It considers how economic abuse and the financial hardship often associated with having to flee and starting over impacts on a victim/survivors choices,

## PROJECT DESCRIPTION

ability to access safety and freedom and their financial status in the long run. The Flexible Funding pot aims to redress the economic injustices and inequalities that many victim/survivors face.

There is still more work to do, including the important work of ensuring that WHA components are accessible to all victim/survivors and that any additional barriers that some

may face as a result of their ethnicity, sexual orientation, disability, immigration status or any other protected characteristic will not prevent them from accessing support and securing a meaningful and sustainable housing outcome.

## Why a Whole Housing Approach?

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It is estimated that 2 million people were subjected to domestic abuse in England and Wales in the year ending March 2019<sup>2</sup> equating to 7.9% of women and 4.2% of men aged 16–59 years. For people experiencing domestic abuse, the home is often the most dangerous place.

Nowhere is this more evident than when we consider the number of victim/survivors, the majority of whom are women, who are killed inside their own homes. The Femicide Census's in 2018 reported that there were 149 women killed by 147 men and that 72% were killed by an intimate current or former male partner or family member. Of those, 68% were killed inside their own home.<sup>3</sup>

The Covid-19 pandemic has resulted in further negative impacts for people experiencing domestic abuse, which is consistent with findings from other pandemics that have documented a rise in Violence Against Women and Girls (VAWG).<sup>4</sup> The Government introduced unprecedented lockdown restrictions and stay at home guidance in response to the public health crisis. We saw early in the pandemic a steady increase in the number of people seeking help from the police, from the national domestic

abuse helpline (25% increase by April 2020) and their local domestic abuse services. There was also an increase in the complexity of cases that domestic abuse services were responding to. Sadly, an increase in the number of domestic homicides was also reported, with the Femicide Census source figures showing that the rate of female domestic homicides had doubled.<sup>5</sup>

The pandemic also resulted in significant negative impacts on the housing situation of women experiencing domestic abuse. Domestic abuse is already one of the major causes of homelessness, particularly for women who make up most victims and who often have to flee for safety reasons. For many women living with their perpetrator, the introduction of lockdown restrictions will have meant being trapped at home, almost 24 hours a day with their perpetrator.



**A Women's Aid Federation of England (Women's Aid) survey investigating the impact of the Covid-19 pandemic on women victim/survivors found that perpetrators used Covid-19 as a tool for abuse in connection to their housing situation, refusing to take precautions to stop the spread of the virus and/or forcing their household to live under unnecessarily strict measures and making it harder to flee.**

The use of economic abuse by perpetrators further destabilised the housing situation of victims/survivors during the pandemic, which may have occurred alongside other types of financial hardships caused by the public health crisis. **A survey carried out by Surviving Economic Abuse (SEA), who lead the WHA's second-tier work on private ownership found that over a third of women's housing situations had worsened because of perpetrators' actions since the start of the pandemic. This same survey found that prior to the pandemic, 14% of women were in rent or mortgage arrears because of the economic abuse of their perpetrators and that this had increased to 25% since the start of the pandemic.<sup>6</sup>**

The pandemic also had a negative impact on housing options and restricted women's ability to move and seek safety. The same Women's Aid survey mentioned earlier found that women were

unsure of the options available during lockdown and indicated that negative experiences with housing professionals during this period affected their ability to access safe, suitable, and more stable accommodation.<sup>7</sup>

Evidence shows that in refuge accommodation for example, there were high numbers of women ready to move on throughout lockdown but were unable to find somewhere else to go and that local authorities failed to meet their public duty around housing, viewing move-on as a non-priority. This results in 'bed blocking', which prevents other women and children being able to access a refuge space when they need it. Demand for refuge already outstrips supply.

**In 2018–19, Women's Aid reported a 30% shortfall in the number of refuge spaces required and 64% of referrals turned away.**

Pre-Covid-19, the 2019 Women's Aid Annual Audit concluded that in England alone there was a short-fall in the number of refuge bed spaces by 1,715, which is 30% below the number recommended by Council of Europe.<sup>8</sup>

Never has there been a greater need, than during a public health crisis, for victim/survivors to have access to safe, affordable, and stable accommodation.

**“How wonderful it is that nobody need wait a single moment before starting to improve the world.”**

**Anne Frank**

## The Domestic Abuse Act

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The Domestic Abuse Act (DA Act), which received royal assent in April 2021, introduces greater powers for protecting people experiencing domestic abuse and intends to progress and improve how sectors such as housing respond to domestic abuse.

The Act introduces a statutory definition of domestic abuse that encompasses emotional abuse, coercive or controlling behaviour and economic abuse as well as physical violence. It also introduces legislation specific to housing.

The following three main provisions relating to housing have been introduced with the DA Act and are accompanied below with a description of how a WHA can support local authorities in fulfilling these duties.



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### Duty to deliver Safe Accommodation Support (Part 4)

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Part 4 of the DA Act places a duty on Tier One local authorities to assess the need for support and prepare strategies to provide support for victims (also referred to as support within safe accommodation). This includes:

- Appoint a Local Partnership Board
- Produce a needs assessment for safe accommodation
- Produce a strategy on safe accommodation
- Commission safe accommodation provision
- Monitor and evaluate the effectiveness of the strategy
- Report back annual to central government

A WHA can support local authorities in fulfilling these duties.

- **Refuge Services** – refer to the [WHA toolkit](#) section 4 for further guidance.
- **Sanctuary Scheme** – refer to the [WHA toolkit](#) section 15 for further guidance.
- **Move On Accommodation** – Work is underway to create a dedicated toolkit section for this housing option. See page 60 for further information.

As local authorities begin to implement and deliver their new duties, they are encouraged to do this within a WHA framework, which has been endorsed by the Domestic Abuse Commissioner and acknowledged as best practice by the Ministry of Housing, Communities and Local Government (MHCLG) in their draft statutory guidance for Part 4 of the Domestic Abuse (DA) Act on the *'Delivery of Support to Victims of Domestic Abuse, including Children, in Domestic Abuse Safe Accommodation Services'*.

A WHA framework encourages local authorities and tier one partnership boards to consider the safe accommodation support needs for victim/survivors in each tenure type and the full plethora of options and initiatives needed in a local area, in addition to those listed as part of the Part 4 definition. The commissioning of dedicated, independent domestic abuse services, accredited by [Women's Aid](#) and [Imkaan](#) is vital to delivering effective safe accommodation provision within the WHA, and that the voice of victim/survivors is placed at the center.

The role of the WHA Coordinator would also play a critical role, bringing together domestic abuse and housing sectors to support local authorities to fulfil the requirements of this duty while connecting to the wider CCR to domestic abuse and other key strategies and pathways.

For example, when carrying out their responsibilities relating to the needs' assessment, strategy and commissioning process Tier One Boards and local authorities should consider homelessness services, strategies and pathways as we know a 2018 evidence review by the University of York found that "experience of domestic violence and abuse is near-universal among women who become homeless".<sup>9</sup>

It is recommended that Tier One Boards and local authorities also consider the safe accommodation support needs of victim/survivors who are placed in temporary accommodation via a local authority's housing service. Tier One Boards and local authorities should consider whether safe accommodation support commissioned through Part 4 can be extended to include victim/survivors living in temporary accommodation, and it is noted that as many of these victims/survivors will have just left a dangerous perpetrator and will be at high-risk of post-separation abuse. Leaving is the most dangerous time for a victim/survivor including their children. This is often the point when victim/survivors need support from domestic abuse services to maintain their safety, freedom and independence from a perpetrator who may be proactively trying to locate the victim/survivor's whereabouts.

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For example, where victim/survivors are being placed in temporary accommodation within the PRS, local authorities should ensure these provisions are safe and that survivors in these setting can equally access support initiative such as Sanctuary Schemes, Flexible Funding and Specialist Domestic Abuse Services.

This work should also consider housing and temporary accommodation allocations with the recognition that B&B's and mixed hostels are not suitable options for domestic abuse, especially for victim/survivors who have experienced multiple disadvantages.<sup>10,11,12</sup>

For victim/survivors sleeping rough and who have struggled to maintain a tenancy, initiatives like the Housing First model delivered with a trauma and gender-informed approach can support women to achieve considerable outcomes, including tenancy sustainment. The section below on Housing First summarises project work in the London site and highlights that all the women engaged have experiences of complex trauma and at least one form of Violence Against Women and Girls (VAWG). Many have current perpetrators. The project has taken the women's lead, supporting them despite perpetrators still being on the scene and building their trust. This has resulted in women disclosing abuse, some for the first time, and involving the police when needed. These are huge and vital steps for these women and help to refocus the dominant narrative around what good outcomes around domestic abuse look like.

A further consideration is whether current housing and temporary accommodation stock in general for victim/survivors is fit for purpose and whether it should include a minimum set of design standards for homes, taking into consider size and security needs.

A WHA Coordinator could lead on strategic work with local authorities, registered providers, domestic abuse services and the government's housing accelerators (Homes England and Greater London Authority) to encourage the development of affordable housing for victim/survivors that considers design and security needs. For example, security measure packages offered through the Sanctuary Scheme could be built into the design from the outset. See the Move On section later in this report for further considerations.



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**The Secure Tenancies Act, which grants secure tenancies in cases of domestic abuse where an original sole or joint secure tenancy (or assured tenancy for housing association tenants) was held (Part 7 miscellaneous and general).**

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The Managed Reciprocal scheme offers a coordinated, cost-effective tool to prevent the loss of social tenancies. It ensures victim/survivors do not have to go through the homelessness route and face having to accept a private rented accommodation without any security of tenure when they had to flee their secure tenancy through no fault of their own.



### 3

#### **Amendment to Part 7 of the Housing Act 1996 and omitting the vulnerability category for Priority Need (Part 7 miscellaneous and general)**

Part 7 of the DA Act Extends homelessness priority need to all eligible victim/survivors of domestic abuse by removing the vulnerability test, which will enable more victim/survivors, mainly with out dependent children to access housing and prevent homelessness.

Access to social housing is vital for many victim/survivors who are looking to overcome the harmful impacts of domestic abuse. Social housing is often more affordable than private renting and usually provides an offer of a more secure, long-term tenancy.

**DAHA's accreditation** process and standards includes 8 priority areas that considers a whole organisation's operations – in this case for a local authority housing service – and helps to create system change within that organisation. This embeds processes that guides behaviour of so that they deliver safe and effective interventions in domestic abuse cases. It prioritises the safety and support needs of victim/survivors and emphasises perpetrator accountability.

A **Co-Located Advocate** is employed by a specialist domestic abuse service and is co-located in a local authority housing service. They bring expertise in safety planning and offer direct support to victim/survivors who present to the local authority housing service as homeless

due to domestic abuse. They may also support the local authority with fulfilling their duties and following procedures to conduct or contribute to homeless interviews in partnership with the housing service, offer support throughout the homelessness prevention, relief and main duty stages included in the Housing Act 1996 and Homelessness Reduction Act (HRA) 2017.

A local authority in London working in partnership with their co-located advocacy service created a domestic abuse specific **Personalised Housing Plan**, which includes prompt questions for staff that uses empathic language and safety planning considerations.

#### **Coordinating the Local Authority's Approach to the three main provisions**

It is recommended that local authorities do not fulfil their responsibilities to Part 4 and Part 7 in isolation, but to coordinate these responses in a way that follows a victim/survivors housing journey. For example, local authorities must ensure that when victim/survivors present as homeless and are considered priority need, that they access quality assured safe accommodation and are provided support within these settings. Equally, where a victim/survivor is leaving refuge and moving on into the community, that they are provided with safe move-on accommodation and support within these settings, and still access services to maintain secure tenancies when applicable.

Through a WHA framework, and with the vital support of specialist domestic abuse services and a WHA Coordinator, local authority areas can ensure that victim/survivors are accessing support within safe accommodation at any stage of their housing journey and in response to any housing need.

## WHA Pilot Project Delivery

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The Ministry of Housing, Communities and Local Government (MHCLG) funded this initial WHA pilot project for a total of 30 months from October 2018 to March 2021. This was delivered in the following sites:

- **Stockton-on-Tees**
- **Cambridgeshire & Peterborough**
- **Three West London Boroughs – Kensington & Chelsea, Hammersmith & Fulham, Westminster**

A multi-agency project delivery team worked together to deliver funded components of the WHA. Eight components were funded in the first year of the project (April 2019 to March 2020) and the components delivered varied across the pilot sites. The [Year 1](#) report summarises the main activities delivered.

Seven components were funded in the second year of the project (April 2020 to March 2021) and the components delivered again varied across the pilot sites. This report summarises activities delivered in this second year and cumulatively to date.

In 2020, the project team produced an online [WHA Toolkit](#) with a section for each of the model's 12 components. This offers practical guidance and resources for areas to implement the model in their locality. It is an accompaniment to this report.

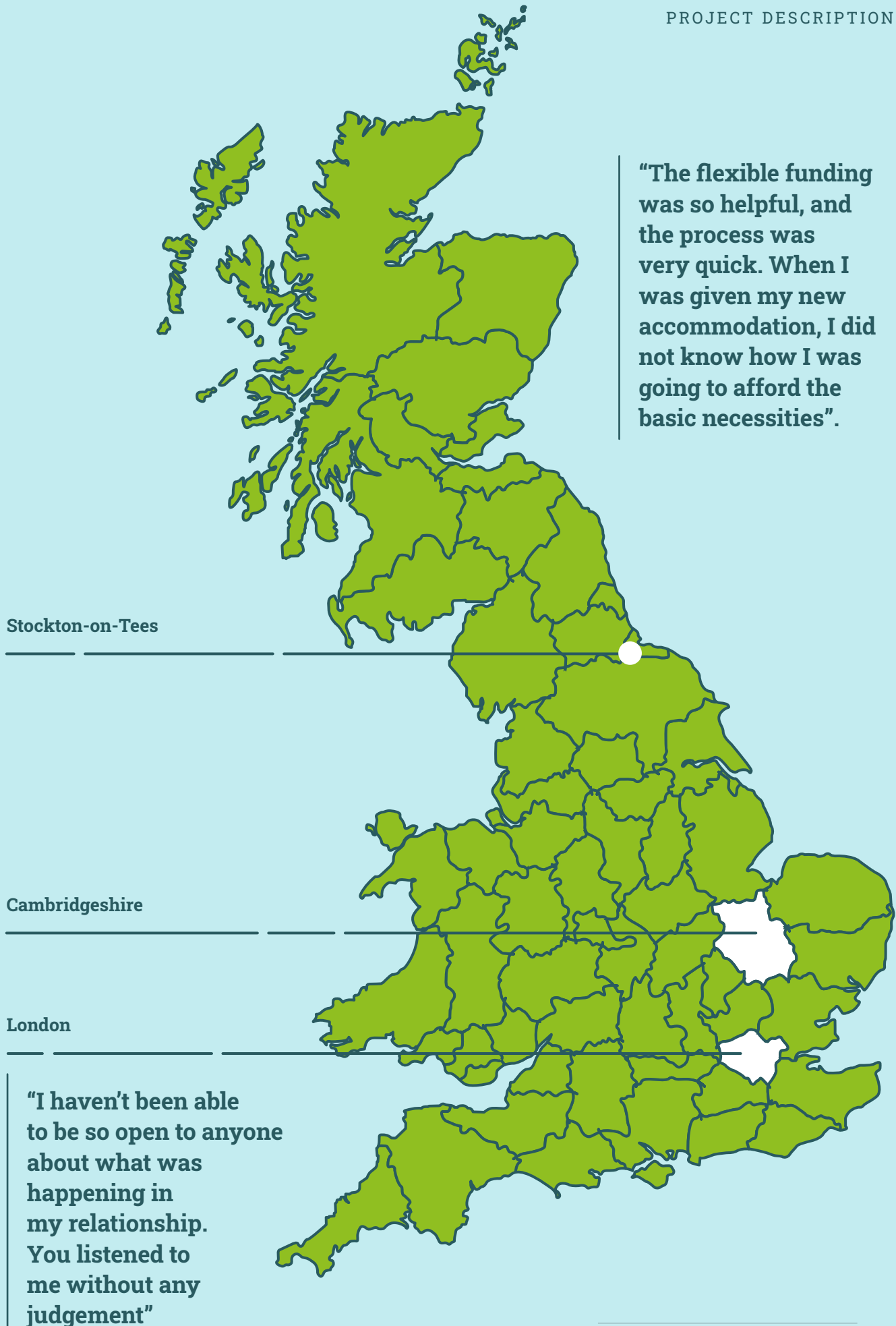
A range of delivery partners carried out the work in the pilot sites. This included local authorities, civil society organisations and specialist domestic abuse services. The WHA project delivery team were funded to deliver two types of services:

- **Direct services** with people experiencing domestic abuse. This work is mainly delivered by dedicated domestic abuse services.

Components are highlighted in purple throughout this report to reflect this level of work.

- **Second tier services** with professionals and organisations who are themselves delivering services to people experiencing (and perpetrating) domestic abuse. This work focused on the main tenure types (social, private rented and privately owned) and mainly offered advisory and development support to help improve an organisations response to domestic abuse.

Components are highlighted in orange throughout this report to reflect this level of work.





## PROJECT DESCRIPTION

In year two, the delivery team were funded to deliver activities on the following 7 components. There is a dedicated section for each component within this report, which includes a description and details of work undertaken.

Component	Delivery Partner	Project Sites
Mobile Advocacy	Cambridgeshire Women's Aid	Cambridgeshire
	Refuge Cambridgeshire	London
	Advance	
Co-located Housing Advocacy	Advance	London (Westminster, Kensington & Chelsea)
Flexible Funding	Standing Together (London)	Cambridgeshire
	Cambridgeshire and Peterborough County Council	London
Managed Reciprocals	Safer London	Cambridgeshire
		London





## PROJECT DESCRIPTION

Component	Delivery Partner	Project Sites
Privately Owned	Surviving Economic Abuse	National
Private Rented Sector	DAHA hosted by Standing Together	National
DAHA for social housing	DAHA hosted by Standing Together	Cambridgeshire

In addition to this funding, the MHCLG also awarded funding to Standing Together and Westminster City Council to develop a **Housing First** project for women with experiences of homelessness, violence against women and girls (VAWG), and multiple disadvantage. Standing Together coordinated the project, working with housing associations that provided units of accommodation and with Solace Women's Aid who delivered specialist support to the women housed there. The project is one of few women's Housing First services in England, and one of the first where support is delivered by a specialist women's service provider.

## The Big Picture: Direct Services

From April 2020 to March 2021, we delivered the following activities:



**2,058 survivors and  
2,055 dependent children**

were supported by **10 mobile advocates**  
and **2 co-located housing advocates**.



**A Reciprocal Scheme  
was introduced in  
Cambridgeshire for the  
first time in May 2019.**

This enabled victim/survivors to move  
to a new home while retaining their  
secure tenancy.



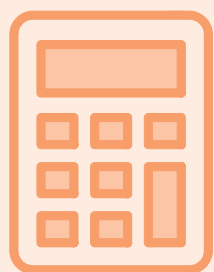
**...living in London and  
Cambridgeshire pilot sites  
from the Flexible Funding  
pot to help them maintain or  
secure safe and more stable  
accommodation.**

Most requests were made for clearing rent arrears  
and debts accumulated due to financial abuse,  
paying for deposits and other move on costs and  
to purchase household items after relocation.

## The Big Picture: Second Tier Services at the National Level

From April 2019 to March 2020, the following work was delivered with organisations and stakeholders involved in the following three main tenure types.

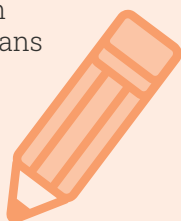
### Privately Owned Housing delivered by Surviving Economic Abuse



**Influenced** national policy on mortgage affordability with a major mortgage lender in the UK and within the Family Court to highlight economic abuse within financial proceedings.



**Successfully** lobbied and campaigning on the legal aid means test for victim/survivors.



**Created** a handful of resources for victim/survivors in relation to economic abuse and homeownership based to raise awareness of options for de-linking from their abuser and staying on the property ladder.

### Private Rented Sector delivered by DAHA PRS Lead

Ongoing partnership building in the domestic abuse and housing sectors, collaborating on policy and project work with



**Influencing** national housing policy, especially in relation to joint tenancies, deposits and Covid evictions.



**over 10 organisations**



**Collaborating** with expert organisations to develop guidance and resources for practitioners and survivors to raise awareness of PRS sector and identify solutions.

### The DAHA team (national)



Awarded **6 housing associations** **1 local authority housing advice team** with DAHA Accreditation.



### Established 10 Domestic Abuse and Housing Regional groups

across the UK sharing best practice, local and national updates.



### Published guidance

for housing providers on how to support victim/survivors in lockdown and throughout the pandemic, which was viewed **4000 times** within the first **6 weeks** of lockdown.

# DIRECT SERVICES TO SURVIVORS



## **Mobile Advocacy**

The Mobile Advocate role exists to help victim/survivors achieve the best housing outcome possible. It is a type of community based outreach support delivered by a specialist domestic abuse service. They offer direct support to victim/survivors at a location of their choosing including their home. They may also deliver services at a range of community settings to offer a more accessible service, particularly in rural areas.

The support offered is broad and led by what the victim/survivors wants help with. This typically involves helping victim/survivors who have a housing need as a consequence of the abuse they are experiencing. They may be unsure about their housing options and rights. They may also want to remain in an existing property or want support with relocating.

For this WHA pilot project, this service was delivered by three specialist domestic abuse services:

- **Cambridge Women's Aid**
- **Refuge Service in Cambridgeshire**
- **Advance Advocacy Project in London.**

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**1,768 survivors  
and 1,812  
dependent  
children**

were supported by 10 mobile advocates  
and 2 co-located housing advocates  
from April 2019 to March 2021

PROJECT IMPACT  
DIRECT SERVICES TO SURVIVORS

“(Before accessing the Mobile Advocacy Service) ...I was completely broken, at rock bottom, feeling very alone vulnerable, loss of all hope, worrying where me and my children would be from one day to the next due to becoming homeless. Feeling hopeless as a mother still allowing myself to take the blame of why my ex-partner treated me the way he did.

My Mobile Advocate was absolutely lovely, amazing, understanding, and supportive. She was helpful in so many ways. She listened and heard my hurt in ways I found it hard for others to do, in the hardest times of life just having someone listen is a magical thing. My worker helped me understand that I didn't have to allow my ex to still control me and manipulate me. She reminded me there was no need to carry fear... that I'm free. I'm starting to find myself again. I'm starting to build my confidence. I am able to smile again. I still have bad days, when these days arrive, I know I can talk with my worker which really helps. Thank you to all Mobile Advocate Workers who are working behind the scenes every minute of every day. Know that you make a difference.”

**Survivor supported by a Mobile Advocate in a pilot site**

**Cambridgeshire**

Y1: 8 mobile advocates  
Y2: 7 mobile advocates

**2019–2020**

933 survivors and  
939 dependent children supported.

**2020–2021**

765 survivors and  
723 dependent children supported.

**Cambridgeshire Women's Aid:**

470 survivors and 564 dependent children

**Refuge Service:**

295 survivors and 159 dependent children supported.

**Total**

1,698 survivors and  
1,662 dependent children supported

**London Boroughs**

Y1: 2 mobile advocates  
Y2: 1 mobile advocate

**2019–2020**

46 survivors and  
117 dependent children supported.

**2020–2021**

24 survivors and  
33 dependent children supported.

**All supported by Advance**

**Total**

70 survivors and  
150 dependent children supported

An analysis of 12 women victim/survivors supported by a Mobile Advocate in the London site looked at housing status upon entry and at exit. The support received by these victims/survivors commenced on or after April 2020. The following table shows the work undertaken to support victim/survivors to achieve the best housing outcome possible:

	Housing Status at referral	What was applied for	Case outcome by March 2021
1	Housing Association, sole assured tenancy	Management Transfer	Temporary accommodation (TA), awaiting Management Transfer
2	Council housing, sole secure tenancy	Management Transfer	Living in current accommodation, pending transfer
3	Council housing, sole secure tenancy	Management Transfer	Living in current accommodation, pending transfer
5	Private Rented Sector (PRS), sole tenancy	Homeless Application	Moved to new PRS accommodation, sole tenancy
6	Council housing, sole secure tenancy	Management Transfer	Living in current accommodation, pending transfer
7	Housing Association, sole assured tenancy	Management Transfer	TA, pending transfer
8	Sofa surfing	Homeless Application	Living in TA and Part VII duty accepted
9	Council, joint tenancy	Homeless Application	Living in TA and Part VII duty accepted
10	PRS, sole tenancy	Homeless Application	Living in TA and Part VII duty accepted
11	Sofa surfing	Homeless Application	Living in TA and Part VII duty accepted
12	PRS, sole tenancy	Refuge service	Secured refuge space

## 42% (5)

had been supported to maintain a secure or assured tenancy with accessing a management transfer via their social landlord. Only two victim/survivors accessed temporary accommodation while waiting for a transfer.

## 100% (5)

of management transfers were still will pending by the end of the project.

## 67 (8)

had been supported to access safer accommodation, either in temporary accommodation, a refuge space or a new PRS property.

## A Mobile Advocate's experience of supporting Angela\*

**Angela is a single mother of 4 children. Her perpetrator, who she had an on and off relationship with, was the father one of her children. He would stay with her and the children for several weeks at a time and then leave only to come back and stay for several weeks. This went on for years and throughout this time, Angela suffered emotional and significant physical abuse. The police were involved, and they referred Angela to a Mobile Advocate. They also referred her to the Multi Agency Safeguarding Hub as all children had witnessed much of the abuse that went on. As a result, Children's Services were involved.**

Angela did not fully recognise that what was happening to her was abuse. Her Mobile Advocate worked closely with Angela in the beginning to help her identify and name her experiences as abuse. Angela wanted to end the relationship. She lived in a Council flat and was the sole tenant so she was within the law to exclude him from her home however she feared he would not accept the relationship was over and continue to abuse her. The Mobile Advocate supported Angela to obtain a Non-Molestation Order against her perpetrator. The Mobile Advocate acted as the main point of contact with the agencies and professionals involved, taking some of the pressure off Angela. The Mobile Advocate also referred Angela to the Bobby (Sanctuary) Scheme, adding additional security measures to her property, which helped her feel safe at home.

A risk assessment was completed with Angela and it was found that she was at high risk of further harm from her perpetrator. Her Mobile Advocate referred her to the Multi Agency Risk Assessment Conference, which brings together key agencies in the community to come up with a plan to help safeguard and reduce the risks posed by dangerous perpetrators.

Alongside this, the Mobile Advocate supported Angela to build her confidence and encouraged her to talk to the police. She also referred Angela and the children to local mental health services to help them overcome the trauma that had experienced.

During this time, Angela's house had caught fire. She suspected it was the perpetrator but had no evidence of this. Her and the children moved in with her mother as her home was no longer habitable. They remained there for a year. So that she did not have to give up her secure tenancy, she considered a move through the **Reciprocal Scheme**, which was introduced as part of this pilot project. The property she was offered was too isolated, and she would not feel safe living in a rural area, in the countryside.

Her Mobile Advocate, acting on Angela's behalf, advocated with the Reciprocal Scheme leads on the areas that she would feel safe to live. As a result, she was offered a different property in a preferred location, near to her where her family was and where she felt she could begin the process of re-building her life. She accepted the property and moved in shortly after. She was again referred to the Bobby Scheme, which made her feel safer. Angela also accessed Flexible Funding to obtain a smart technology doorbell, which includes a motion detecting camera and connects to an app.

Throughout all of this, the Mobile Advocate provided ongoing emotional, practical and advocacy support to Angela. Her perpetrator was charged for his abusive behaviour and the Mobile Advocate arranged for Angela to give evidence from a separate court so she would not have to see him. He was unfortunately found not guilty.

Angela was supported over a long period spanning several years. Her story highlights the complexity that survivors must deal with and the length of time it can take to break free from their abuser. It also shows the benefits of multi-agency involvement and how the combination of WHA interventions is needed to help survivors feel and keep safe.

\*Names have been changed to protect the identity of survivors



## **Co-located Housing Advocacy**

Similar to the Mobile Advocate role, the Co-Located Advocate exists to help victim/survivors achieve the best housing outcome possible. It is a type of community based, outreach support delivered by a specialist domestic abuse service and co-located withing a housing service such as local authority housing needs service or housing association. They offer direct support to victim/survivors via the route that victim/survivors would access the housing service.

The support offered starts by gathering information about the victim/survivors housing needs. This typically involves talking about the housing options available and co-creating a safety plan for immediate and longer-term safety and protection. It may also support the local authority with fulfilling their duties and following procedures to conduct or contribute to homeless interviews in partnership with the housing service, offering support throughout the homelessness prevention, relief and main duty stages included in the Housing Act 1996 and Homelessness Reduction Act (HRA) 2017.

Co-Located Advocates also offer advice and guidance to staff based in the organisation by advising on case work and delivering training to increase awareness and upskill the department's response to domestic abuse.

For this pilot, the service was delivered by Advance Advocacy Service, who have been delivering a Co-Located Advocate in Hammersmith Council since 2007. For this pilot, the co-located advocates were based in two London Borough Councils for the first time.

Between April 2019 and March 2021

# **290 survivors and 243 dependent children**

**were supported by 2 mobile advocates located in two London borough Council Housing Needs services**

**“Since working with you on this case I have been able to understand the complexities of Domestic Abuse”**  
**Housing Officer**

**“I did not realise that I was in an abusive relationship until began working with you. I can now see the tactics my ex-partner used to control me”**  
**Survivor supported by a Co-Located Advocate**

PROJECT IMPACT  
DIRECT SERVICES TO SURVIVORS

“I was scared to approach the council because I thought I would not be believed. It was helpful that I was able to speak directly with (my co-located advocate) to explain the risks posed to me from my ex-partner”

**Survivor supported by a Co-Located Advocate**

“I waited so long for my management transfer. Being able to keep my secure tenancy has made me feel relieved”

**Survivor supported by a Co-Located Advocate**

“Thank you for being consistent in checking in with me”

**Survivor supported by a Co-Located Advocate**

London

**Survivors supported**

**2019–2020**

106 survivors and  
122 dependent children supported.

**2020–2021**

184 survivors and  
112 dependent children supported.

**Total**

290 survivors and  
243 dependent children supported.

**Housing staff supported**

**2019–2020**

115 staff supported with their own cases

157 staff received training on domestic abuse awareness across the three London project sites.

**2020–2021**

318 staff supported with their own cases.

30 staff received training on domestic abuse awareness across the three London project sites.

**Total**

433 staff supported with their own cases.  
187 staff received training on domestic abuse

An analysis of 10 women victim/survivors supported by a Mobile Advocate in the London site looked at the housing status of these victims/survivors upon entry and at exit. The support commenced on or after April 2020 and onwards. The following table shows the work undertaken to support victim/survivors to achieve the best housing outcome possible:

	Housing Status at referral	What was applied for	Case outcome by March 2021
1	Homeless, sofa surfing	PRS	Moved to new PRS property
2	Homeless, staying in hotel	PRS	Moved to new PRS property
3	Homeless, staying with family	Homeless Application	Moved into temporary accommodation (TA), Part VII application
4	Homeless, sofa surfing	Homeless Application	Moved into temporary accommodation (TA), Part VII accepted
5	Housing Association, sole tenancy	Homeless Application	Moved into temporary accommodation (TA), Part VII application
6	Private Rented Sector (PRS)	PRS	Moved to new PRS property
7	Homeless, sofa surfing	Sanctuary Scheme	Moved back to home address, Housing Association, sole tenancy
8	Homeless, staying with friends	Homeless Application	Moved into temporary accommodation (TA), Part VII application
9	Homeless, sofa surfing	Homeless Application	Moved into temporary accommodation (TA), Part VII application
10	Homeless, sofa surfing	PRS	Moved to new PRS property

## 67% (8)

of women had already left their home and had found a temporary solution by staying with friends and family before approaching the local authority for help.

Future analysis should look at the original accommodation that victim/survivors were fleeing from to better understand prevention and earlier intervention strategies.

## 33% (4)

had moved into a PRS property, which is associated with higher rent costs than social housing.

## 42% (5)

made a homeless application under Part VII of the Housing Act. All were placed in temporary accommodation.

## PROJECT IMPACT

### DIRECT SERVICES TO SURVIVORS

A victim/survivor's financial situation can be depleted by a variety of factors including the onus on victim/survivors to relocate for their safety; the costs associated with starting over in new accommodation; experiences of economic abuse; a shortage of affordable housing and welfare benefit reforms. Social housing is more secure than private rented accommodation and has 'social rent', which is on average 50% of the market rate linked to local wages.\* This type of housing offers much needed security to victim/survivors to begin the process of rebuilding their lives.

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## In 1 instance,

homelessness was prevented with the assistance of the Sanctuary Scheme, which offers additional security to an existing home where the perpetrator does not or is no longer live with the victim/survivor. This option gives victim/survivors choice to remain in their home and often leads to increased physical and perceived sense of safety.

**“I really appreciate how you have kept me updated regarding the status of my homeless application”**

**Survivor supported by a Co-Located Advocate**

**“Since working with you I am more aware of the options available to me”**

**Survivor supported by a Co-Located Advocate**

**“I was offered accommodation and I had no money to help with the removal costs. I am glad my (co-located) advocate was able to apply for flexible funding”**

**Survivor supported by a Co-Located Advocate**

\*Social rents vary from area to area and are set using a government formula. This creates a 'formula rent' for each property, which is calculated based on the relative value of the property, the size of the property and relative local income levels.

Landlords have flexibility to set rents up to %5 above the formula rent (%10 in the case of supported housing) – this is known as the 'rent flexibility level'. Formula rent is also subject to rent caps, which vary according to the size of the property.

## A Co-Located Housing Advocate's experience of supporting Kate\*

**Kate\* presented to her local authority housing needs service after fleeing domestic abuse from her ex-partner who had been physically, emotionally, and verbally abusive towards her. Kate was referred to the Co-Located Housing Advocate by the Housing Officer after disclosing the domestic abuse.**

During the initial meeting, Kate explained how her ex-partner would pull her hair and slap her. Despite the relationship being over Kate's ex-partner would still try to control her by telling her what she could wear and the friends she could have. Kate's ex-partner was extremely possessive and would often accuse Kate of sleeping with other men. As a result, Kate felt unsafe in her property and left to temporarily stay with a friend.

The Co-Located Housing Advocate provided Kate with immediate support, advice and explained the options available to her, including reporting to the police, civil & criminal remedies, financial advice, and housing options. Kate had an assured sole tenancy with a housing association, so the Co-Located Housing Advocate explored the option of a Pan London Housing Reciprocal application. Kate was unaware of this option and was pleased to know that she could still retain her assured tenancy whilst being able to move to another property unknown to her ex-partner.

Kate disclosed feeling emotionally impacted by the abuse she had experienced. The Co-Located Housing Advocate referred Kate to a counselling service which specialises in domestic abuse counselling for survivors. The Co-Located Housing Advocate also worked with Kate in understanding domestic abuse dynamics and power and control.

The Co-Located Housing Advocate worked in partnership with the Housing Officer to liaise with the housing association to support Kate with an urgent Pan London Reciprocal application. Kate was offered temporary accommodation but declined this because she felt it would further isolate her and she would rather stay with her friend.

Kate was offered a property within a couple of months, which she accepted. The Co-Located Housing Advocate supported Kate in preparing for her move, creating a safe moving plan and an extensive safety plan. The Co-Located advocate was able to offer flexible funding secured on behalf of Kate to support with moving costs to her new property.



## PROJECT IMPACT

The support and advice received from Co-Located Housing Advocate included:

- Conversations to increase awareness of domestic abuse signs, its impacts and the options available
- Emotional support
- Liaison with Local Authority's Homeless and Housing Needs team
- Liaison with the housing association
- Referral and liaison regarding the Pan London management transfer, which enabled Kate to maintain her secure tenancy
- Flexible funding and support with move on
- Referral to a domestic abuse counselling service

Kate reported feeling supported by the Co-Located Advocate who was able to liaise on her behalf and support her with the Pan-London Reciprocal transfer, flexible funding, and safe move on whilst maintaining her sole tenancy rights. She felt the benefits of counselling and having a better understanding of the trauma she had endured due to the domestic abuse.

Kate talked positively of the support she had received from her Co-Located Advocate, with whom she had established a trusting relationship. She reported that she felt at ease talking to her Co-located advocate because she understood her circumstances. Through this support, Kate said that she had gained a better knowledge of the options available to her and as a result, felt more in control of her life. She described feeling empowered and is looking forward to continuing to live a life free of abuse and control.



\*Names have been changed to protect the identity of survivors

## **Flexible Funding**

Flexible Funding is a designated funding pot that victim/survivors can access easily and quickly to retain or secure safe and stable housing. It is accessed via a specialist domestic abuse services and in this case via the Mobile Advocacy and Co-Located Housing Advocacy roles.

Flexible Funding gives domestic abuse advocates a tool to help victim/survivors alongside the advocacy services they offer including safety planning, emotional support, offering advice and information on options and practical advocacy with other services. It provides a more equitable and accessible solution to financial crises caused by domestic abuse that may otherwise spiral into homelessness or leave a victim/survivor no alternative but to remain trapped with their perpetrator.

It is low barrier and does not require victim/survivors to provide evidence of abuse. There is no set list of what will be funded. It exists to fund whatever will help a victim/survivors access the best housing outcome possible for them in the short and long term.

This component of Whole Housing is inspired by the work of Professor Cris Sullivan and her colleagues at the Washington State Coalition Against Domestic Violence. A special thanks to Professor Sullivan and her team for sharing their learning and resources to help embed this in the WHA.

Flexible Funding was offered by three specialist domestic abuse services:

- **Cambridge Women's Aid**
- **Refuge Service in Cambridgeshire**
- **Advance Advocacy Project in London.**

**Between April 2019 and March 2021**

## **245 survivors and 166 dependent children**

**living in London and Cambridgeshire pilot sites accessed £102,282 to help them secure more stable and safe accommodation.**

**“The survivor we supported to access the fund applied for a small amount so she could purchase homeware, items that she simply did not have on entering our local refuge. She purchased items such as curtains, cushions, cutlery, plates...the small things that make a house a home. The items that many of us take for granted but for others become precious things, which would take a long time to save up for when they don't have a lot of money. This is often the case for women fleeing domestic abuse.”**

**WHA Coordinator administering the pot**

“The women who come to our refuge are often destitute. They have nothing apart from the clothes on their back. Funding, such as the Flexible Funding Scheme, is a life saver and changer. This scheme gives women hope. The happiness that it brings to these women, who have given up so much and don't expect anything, is immeasurable. They cannot believe that this is for them, and it makes them feel like they have a standing in this world. It empowers them!

I feel lucky that I can be here to help. It makes me feel a special kind of warm and fuzzy to see that these women and their young children have a good future with health and wellbeing and knowing that they themselves can feel it is incredible!”

**Halo Project Worker (Specialist Black and Minoritised Women DA Service)**



## Cambridgeshire

**April 2019 to March 2020**

Total amount issued: **£40,749**



Flexible Funding was awarded to **93 survivors** and **146 dependent children**

The **average sized grant was £350** (range from £12.98 to £1,669)

Of the **93 grants**,  
**4%** were for educational costs,  
**29%** was for rental assistance and deposits,  
**17%** for home essentials,  
**46%** for basic needs,  
**4%** for other needs such as legal costs



Of the **survivors supported**,  
**100%** were female  
**30%** were from a black and minority ethnic group (where data provided).



### April 2020 to March 2021

Total amount issued: **£24,750**



Flexible Funding was awarded to **86 survivors** and **142 dependent children**

The **average sized grant was £350** (range from £12.98 to £1,669)

Of the **86 grants**,  
**7%** was for rental assistance and deposits,  
**15%** for home essentials,  
**8%** for basic needs,  
**18%** for other needs such as legal costs and moving costs,  
**3%** Wellbeing and mental health,  
**49%** Safety Enhancements to Home (not covered by the Sanctuary Scheme)



Of the **survivors supported**,  
**97%** were female  
**3%** were men  
**10%** were from a black and minority ethnic group (where data provided).

### Total

Total amount issued: **£65,499**



Flexible Funding was awarded to **179 survivors** and **288 dependent children**

The **average sized grant was £350** (range from £12.98 to £1,669)

“I had been with my husband for years, just putting up with the abuse. My Mobile Advocate found me a house to move to. I had nothing. With Flexible Funding I was able to buy beds for my children, a cooker and a sofa. Without this fund, I may not be here now.”

**Survivor from a pilot site**

“I really didn’t want to leave my home. I was so scared he would turn up at my door. Flexible Funding paid for a ring doorbell. Now at least I can see who is there. I feel much safer now”

**Survivor from a pilot site**

“My Mobile Advocate had found me a flat to rent privately. I had all my things and I was ready to go but I just didn’t have the money for a deposit. Flexible Funding allowed me to put a deposit down and I moved into my new flat with my new baby.

**I am so happy”**

**Survivor from a pilot site**

## London

**April 2019 to March 2020**

Total amount issued: **£26,186**



Flexible Funding was awarded to **48 survivors** and **39 dependent children**

The **average sized grant was £560** (range from £13 to £2,123)

Of the **48 grants**,  
**4%** were for educational costs,  
**17%** was for rental assistance and deposits,  
**46%** for home essentials,  
**33%** for basic needs



Of the **survivors supported**,  
**100%** were female.  
**56%** were from a black and minority ethnic group.  
**25%** had No Recourse to Public Funds (where data provided).

### April 2020 to March 2021

Total amount issued: **£10,596.56**



Flexible Funding  
was awarded to  
**18 survivors** and  
**24 dependent children**

The **average sized grant was £560**  
(range from £13 to £2,123)

Of the **48 grants**,  
**22%** were for educational costs,  
**22%** was for rental assistance  
and deposits,  
**16%** for home essentials,  
**31%** for basic needs,  
**26%** for other needs such  
as legal costs and moving costs,  
**5%** Safety Enhancements to Home  
(not covered by the Sanctuary  
Scheme)



Of the **survivors supported**,  
**89%** were female  
**11%** were men  
**79%** were from a black  
and minority ethnic group  
(where data provided).  
**5%** had No Recourse  
to Public Funds (where  
data provided).

### Total

Total amount issued: **£36,782.56**



Flexible Funding  
was awarded to  
**66 survivors** and  
**63 dependent children**

The **average sized grant was £560**  
(range from £13 to £2,123)

## **Managed Reciprocals Moves**

A Managed Reciprocal scheme is a voluntary collaboration between local authorities and registered housing providers to move people from one social housing tenancy to another. Its purpose is to enable victim/survivors to retain a secure tenancy and prevent homelessness for victim/survivors fleeing all forms of violence against women including domestic abuse.

[Safer London](#) established the reciprocal scheme in London in 2016 and in the first year of the WHA pilot, they brought their expertise to this project by establishing a reciprocal scheme in Cambridgeshire in 2020. Throughout that year, Safer London provided coordination support one day a week, bringing together local housing providers to produce the scheme. They established referral pathways, embedded local protocols and procedures to facilitate moves and monitored its delivery.

The Cambridgeshire procedures included the option of relocating perpetrators where the victim/survivor is agreement with this and felt this would increase their safety. This option enables victim/survivors to remain in their own home when they want to. It can also facilitate a quicker move as it is often easier to identify a property for a single person than a family.

Safer London had also worked with Stockton-on-Tees Council to explore introducing the scheme there and found that their existing Choice-Based Lettings scheme was able to facilitate such moves effectively and establishing a reciprocal scheme was not necessary.

Safer London did work with Stockton Council to introduce the following domestic abuse specific responses:

- Added a flagging system for domestic abuse on their case management system.
- Established a referral pathway with their local domestic abuse services so that this could be offered to anyone where domestic abuse had been flagged.
- Started asking victim/survivors if they needed the Sanctuary Scheme in the new home they were relocating to.

In 2020 – 2021, Cambridgeshire County Council took on the coordination of the scheme, which the WHA Coordinator supported.

Safer London continued delivering focused work in the three London boroughs to increase their engagement with the scheme. They worked with the nominated Reciprocal Lead in each of the respective local authorities to promote the scheme locally. Safer London held a Leads workshop and delivered training sessions to assist the leads in their role within the local authority.

From April 2019 to March 2021, we delivered:



## Cambridgeshire

2019 – 2020

**17** referrals received

**6** successful moves

2020 – 2021

**6** referrals received

**5** successful moves



## London

2019 – 2020

**18** referrals received

**4** successful moves

2020 – 2021

**26** referrals received

**3** successful moves

Total

**23** referrals

**9** moves

Total

**44** referrals

**7** moves

## PROJECT IMPACT

### DIRECT SERVICES TO SURVIVORS

In March 2021, Safer London held a webinar to promote the Managed Reciprocal with local authorities in England. This event shared learning from the WHA pilot and resources for setting this up in new areas. The recording and resources are available on the WHA Toolkit page, in the Reciprocal Scheme chapter.

[www.dahalliance.org.uk/what-we-do/whole-housing-approach/whole-housing-toolkit/](http://www.dahalliance.org.uk/what-we-do/whole-housing-approach/whole-housing-toolkit/)

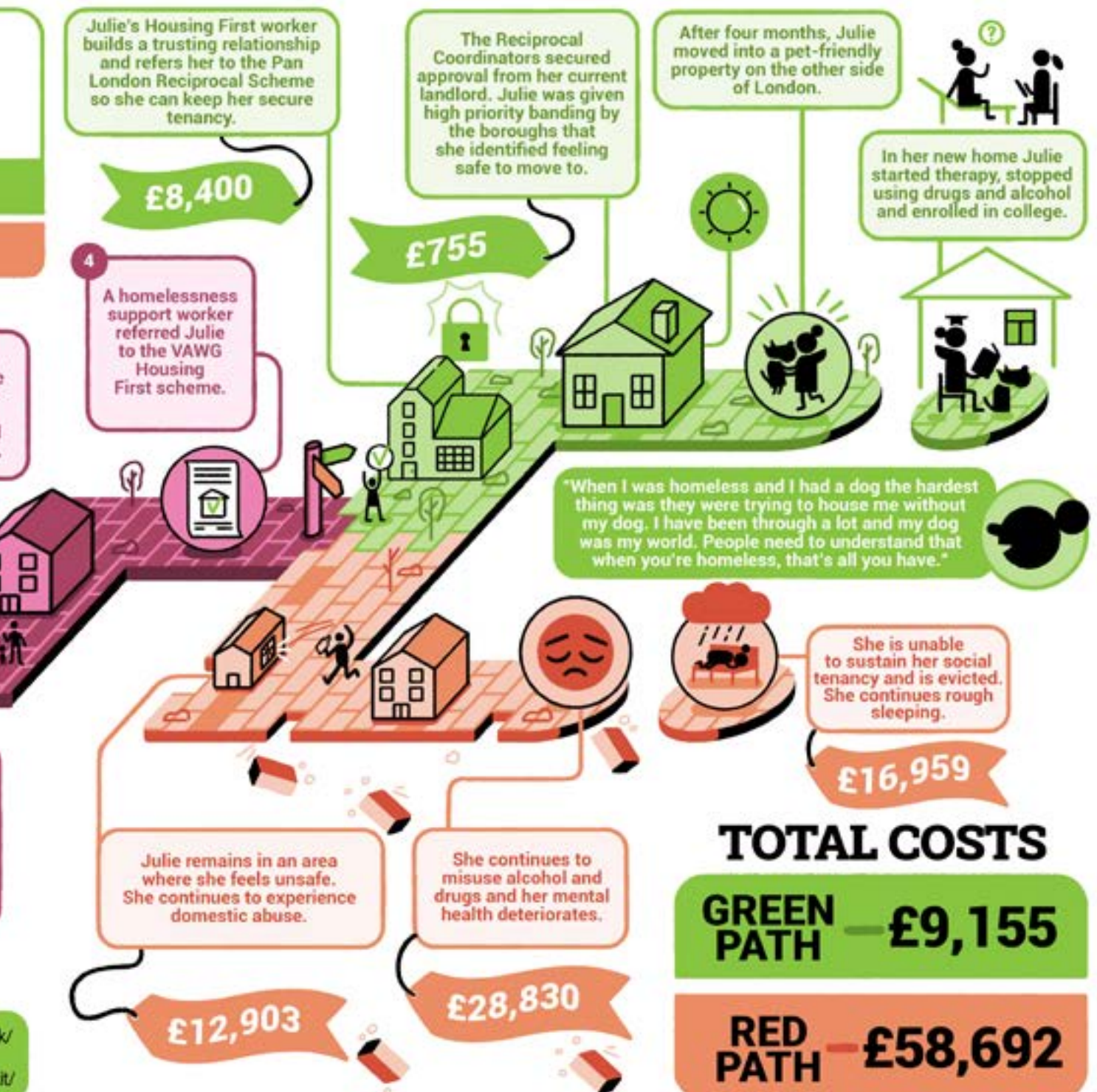
The following case study is based on an actual survivor's experience of being supported by a WHA intervention, which includes a move through the Managed Reciprocal scheme. It shows the interventions delivered (Managed Reciprocal scheme and Housing First support), the outcomes achieved and the harmful outcomes that were prevented.

In this instance, the survivor requested a property that she could live in with her pet dog, whom she identified as her main source of support. Initially, the housing department that she approached could not offer her this. With the support of her Housing First Worker and the Managed Reciprocal scheme, she was able to find a property that could accommodate her needs.

This case study highlights the difference made when delivering a needs-led, trauma-informed service. The cost-benefit analysis applied shows that this kind of intervention can create significant cost savings to the public purse.







# SECOND TIER SERVICES TO SURVIVORS





## WHA Coordination

The successful delivery and management of an effective WHA requires coordination, ideally through a dedicated WHA Coordinator. A coordinator will establish, nurture, grow and sustain a WHA partnership, which should connect to the local CCR governance structure where this exists.

A WHA operational group/s for example could bring together key organisations and stakeholders from each of the 12 WHA components to meet regularly and review how housing initiatives and support are helping to keep victim/survivors safe and holding abusers to account.

This work should connect to the local areas Violence Against Women and Girls (VAWG) or domestic abuse strategy and other local strategies and action plans, including the Safe Accommodation Strategy, which Tier One Boards have a responsibility under Part 4 of the DA Act to produce by October 2021.

The WHA group will meet several times throughout the year and will be responsible for:

- Ensuring the voices and experiences of all victim/survivors, including those with a protected characteristic and who are experiencing multiple disadvantages, are reflected in the strategy and action plan through victim/survivor consultations.
- Monitoring local need across the WHA components and existing pathways and referral routes. Identify areas of good practice, areas where there are gaps and challenges and work together to develop areas where improvement is required.
- Reviewing and analysing local data, including that from the Part 4 Needs Assessment that is required to be undertaken. They may work to expand the data collected from the needs assessment so that it is inclusive of all victim/survivors including those from minority communities and underrepresented groups.

They could also map responses against all the components in the WHA. This work can help evidence the need for further actions and future investment required through commissioning plans for example.

A dedicated WHA Coordinator can facilitate and administer this group. With a focus on housing, they can also discover gaps in operational activity and then work with local partners to remove barriers. They steer the group by ensuring full and appropriate membership, reviewing this, and continuing to grow the group over time. They may also invest time in engaging the unengaged and drawing them into the CCR partnership and WHA response. They maintain oversight of the group's action plan, monitoring progress and developing local process and pathways that create safer, effective, and more joined up service delivery.

A WHA Coordinator may also manage offshoot projects, particularly relating to any of the 12 components. This could include working with individual organisations to improve their operational processes for how they identify and respond to domestic abuse. For example, they could work with a handful of letting and estate agents in the local area to revise and embed domestic abuse within their policies and procedures. Another option would be convening a subgroup that looks at how housing providers are responding to domestic abuse and how they can do more to hold perpetrators to account.

## **The work of a WHA Coordinator**

The project was coordinated by three WHA project leads, one for each pilot site. Collectively, they carried out the following activities over the course of the pilot. These tasks combined could not feasibly be carried out by one person. Rather, the collated list is included to inspire other areas to consider how they could make best use of this role.

- Led on the project management of the WHA project delivery in their locality and connecting this to the wider CCR partnership. This included producing project delivery plans, communication plans, briefing guides and developing monitoring tools for WHA components each site was funded to deliver.
- Delivered events, presentations and talks with local and national stakeholders to promote the work and engage new stakeholders and raise awareness of victim/survivors' safety and housing needs. This included organising the WHA toolkit launch event in November 2020, which was attended by 350 professionals, mainly from local authorities.
- Facilitated a WHA Operational Group or equivalent, which met four times a year and focused on the delivery of a WHA response. This included producing a terms of reference and action plan for the group, in consultation with members.
- Carried out a scoping and mapping exercise against the 12 components of the WHA to measure the local response. This included consultations with victim/survivors. This was done as part of the strategic and operational coordination and development of the WHA alongside the introduction of the new Part 4 duty included in the DA Act. A report was produced for local commissioners and the Tier One Board to inform their activities relating to undertaking a needs assessment, producing a strategy, and commissioning 'safe accommodation' support to victim/survivors.
- Convened and led a DAHA steering group as part of work towards acquiring DAHA's accreditation mark. This included bringing together representatives from across the organisation to lead on the 8 priority areas included in the standards. This work included carrying out an audit of the organisation's current response (staff and survivor surveys, reviewing case records and mapping responses against the 8 priority areas). The WHA Coordinator presented the audit to the steering group, who used DAHA's accreditation assessment document as their action plan and met every 4 weeks to discuss progress against this.

- Coordinated the local Sanctuary Scheme on behalf of a local authority. This included convening a 'Sanctuary Scheme working group' as a subgroup to the WHA Operational Group, which brought together local partners from across different authorities to review their schemes and aim for more consistency. This group helped inform the development of the Sanctuary Scheme Toolkit Chapter, part of the WHA online toolkit.
- Administered the Flexible Funding pot, which included setting up local processes and developing guidance needed to get this started. They oversaw referrals and processed requests. They produced quarterly monitoring reports and worked with local domestic abuse services to ensure that all domestic abuse workers were aware of the fund and knew how to refer in.
- Helped set up and operate the local Managed Reciprocal scheme. This included identifying leads and then bringing together the main social housing landlords as part of the initial set up. Establishing referral pathways, adapting resources shared by Safer London including referral and monitoring forms.



## Privately Owned Homes

Surviving Economic Abuse (SEA) is the only UK charity dedicated to raising awareness of economic abuse and transforming responses to it. As WHA delivery partner, SEA leads on work in the private ownership sector and provides an economic abuse lens to other strands of the WHA.

SEA continued delivering pioneering work in the private ownership sector at the national level through a dedicated Policy Officer for Housing. Scoping in year 1 of the pilot identified three key systems through which abuse takes place:

1. Home purchase and sale
2. Mortgage lending
3. Family law response

SEA's work in year 2 focused on the following three key development areas. Each section includes an update on the key activities undertaken in 2020–21.



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### Influencing policy and practice

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Activities delivered:

- **Mortgage affordability:** SEA has continued to look at mortgage affordability assessments which appear to act as a barrier to victim/survivors who are seeking to de-link economic ties to the abuser.
- Dedicated work with Lloyds Banking Group mortgages team, who hold over 20% of the UK mortgage market to review and gain insights on the process of assessment of affordability. Presenting to Lloyds Banking Group's customer lending team of over a hundred members of staff who work with mortgages.

• **Financial proceedings in the family court:**

working in partnership with Northumbria University Law School on two projects to inform their work:

- Economic abuse within financial proceedings – SEA requested five areas of focus for the literature review: Consideration of conduct; Disclosure of assets; Freezing of assets; Enforcement of orders; and Special Measures during financial proceedings.
- The experiences of victim/survivors applying for occupation orders – in addition to the literature review, a questionnaire has been circulated publicly to capture the experiences and opinions of professionals and interviews have taken place with survivors.

This evaluation will enable SEA to develop practical resources for victim/survivors covering the five areas outlined above. SEA will publish findings in a report in 2021 on the experiences of victim/survivors accessing occupation orders.

• **Education and awareness raising:** SEA delivered workshops for a handful of legal stakeholders and membership bodies. These workshops were attended by over 100 barristers to highlight how economic abuse takes place within legal proceedings. They encouraged these professionals to consider how they might challenge common practice and better support victim/survivors.

• **Legal aid:** successfully challenged the Government through an amendment to the DA Bill that prevents GPs from charging victim-survivors for legal aid gateway evidence, such as letters confirming their injuries.

Produced a report based on a survey with 43 members of their [Experts by Experience Group](#), who work alongside SEA to share their experiences of economic abuse and be a force for change, on the subject of legal aid. Insights from this report were included in SEA's response to the Ministry of Justice's consultation to review the legal aid means test.



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**Media work**

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Activities delivered:

- SEA has secured media coverage in relation to economic abuse and housing with the following publications: Lexology, The Telegraph, Scottish Legal News, iNews, NerdWallet, This Is Money, MSN and Grazia.

## 3

## Media work

- **Enquiries:** SEA receives many queries through email and social media, and their policy is to respond to everyone who reaches out for help. The Policy Officer for Housing offered her specialist housing knowledge, particularly in relation to queries about privately owned housing.
- **Resource development:** SEA created a [series of reports](#) for victim/survivors focussing on the needs of homeowners, which were published in March 2021.
  - Staying on the property ladder (married – family law)
  - Staying on the property ladder (unmarried – civil law)
  - Avoiding repossession after economic abuse

These will be supplemented by the resources being produced by Northumbria University (mentioned above), providing comprehensive information for victim/survivors of economic abuse who are trying to de-link a privately owned home from an abuser, whilst trying to remain on the property ladder. This plugs an information gap and is of particular importance due a disproportionate lack of access to legal advice for this group. This is due to the assessment of capital contained in the Legal Aid Agency's means test legal aid means test often excludes victim/survivors who are home owners from legal aid, even where they have no tangible access to the equity in their home. As one victim/survivor told SEA:

SEA is also receiving pro bono support from Hogan Lovells to investigate reparations for victim/survivors. This will see the creation of a comprehensive report that sets out various routes to redress/compensation available to victim/survivors of economic and financial abuse through the legal system. Within the report, housing is addressed, including looking into occupation orders and how these orders can be used not only to enable victim/survivors to stay in their homes, but also to look at how they can be used to ensure rent, mortgage payments or other outgoings are paid by the perpetrator. In addition, the report examines how landlords can use possession proceedings to support victim/survivors to stay in their homes.

**“What great resources, I’m so pleased SEA are doing this, as when I first contacted [SEA] I just couldn’t find anything about it! It made me a bit emotional to see how far things have moved on thanks to you lot in such a short space of time.”**

## Expert by Experience

PROJECT IMPACT  
SECOND TIER SERVICES TO SURVIVORS

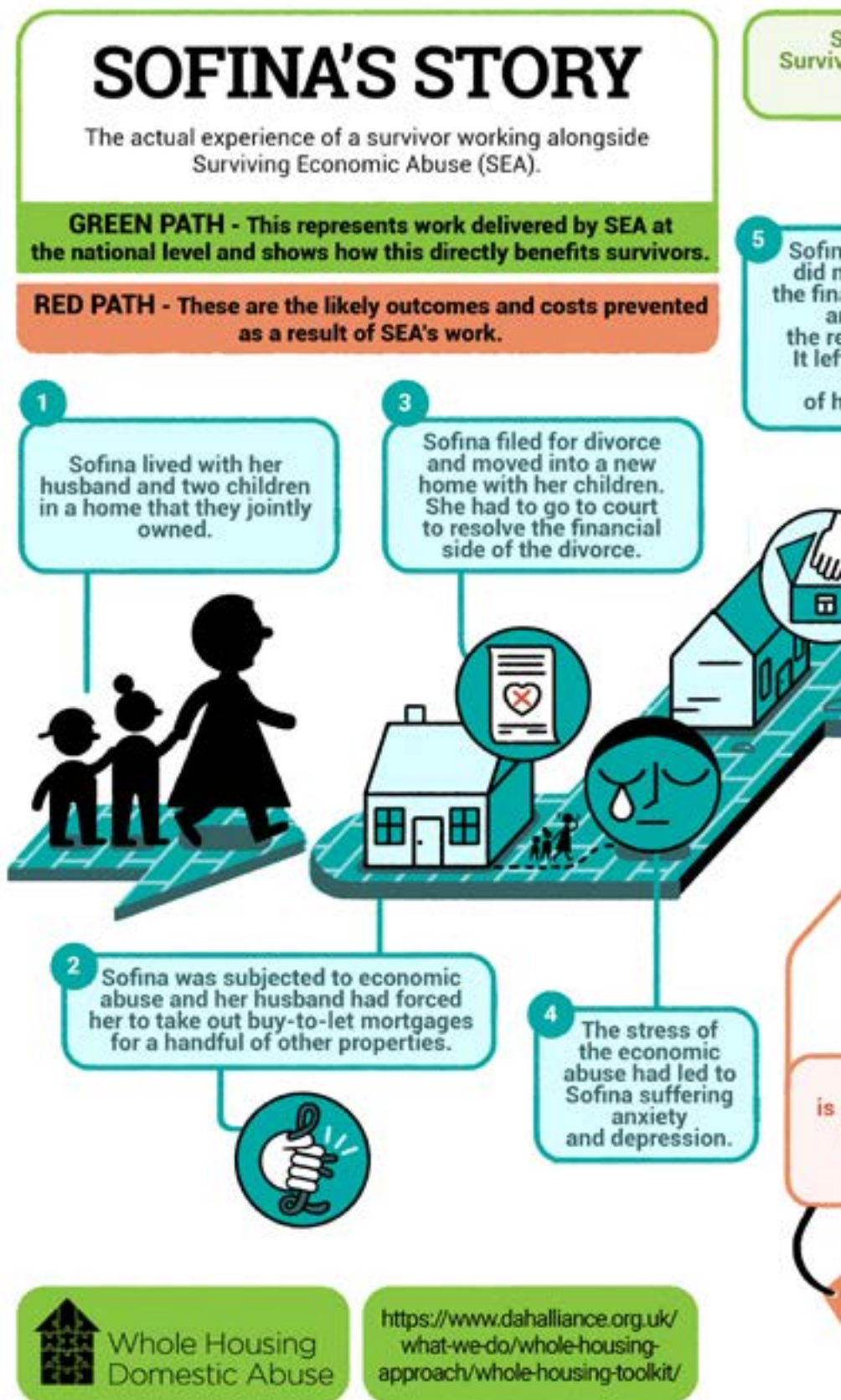




PROJECT IMPACT

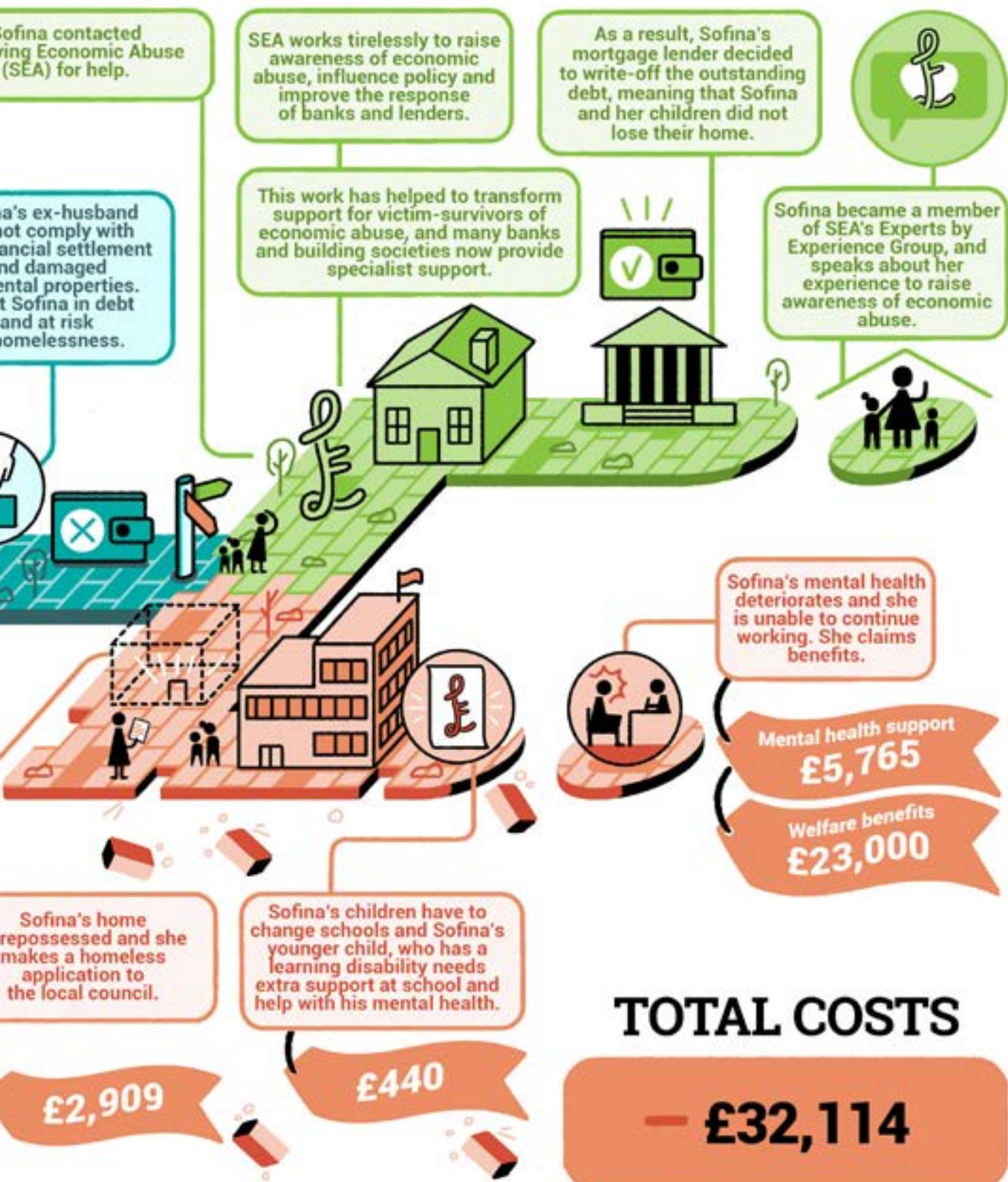
SECOND TIER SERVICES TO SURVIVORS

Sofina’s case study highlights how SEA’s work at the second-tier level produces direct benefits to survivors and the harmful outcomes and associated costs it helped prevent.





PROJECT IMPACT  
SECOND TIER SERVICES TO SURVIVORS



## Private Rented Sector

The DAHA Private Rented Sector (PRS) Development Manager has made significant advancements with this project over the past year. The aim of this project is for survivors of domestic abuse living in the PRS to be able to achieve safe and secure housing and to receive a safe and consistent response from landlords and letting agents, local authorities, and specialist domestic abuse services.

The focus of this work took place at a national level and included some local work in the three pilot sites, mainly with the local authorities PRS teams and domestic abuse services.

The DAHA PRS Lead collaborated with the following key stakeholders to deliver this work:

- Survivors of domestic abuse living in the PRS.
- Private landlords and letting agents.
- Local authority housing teams including Environmental Health and PRS Teams
- Specialist domestic abuse services and the wider strategic domestic abuse response
- National housing leaders, including the National Residential Landlords Association (NRLA) and the Association of Residential Letting Agents (ARLA) and FixFlo, National Housing Federation and Chartered Institute of Housing
- National domestic abuse expert partners such as Women's Aid Federation England, Surviving Economic Abuse and Law for Life
- Academics/researchers

This work focused on the following five key development areas. Each section includes an update on the key activities undertaken in 2020–21.

# 1

**Policy and Public Affairs:** To build on DAHA's partnerships, influence, and expertise in housing and domestic abuse, to influence changes in policy and legislation that may impact the economic and housing options of survivors living in the private rented sector.

Activities delivered:

- Submitted a response on the draft Code of Practice: RICs and TOP's regulation of Property Agents (RoPA) – writing this in partnership with a WHA delivery partner Surviving Economic Abuse (SEA), this highlighted some key areas where domestic and economic abuse could be highlighted and incorporated into the Code, particularly new requirements to report criminal activity to the police and defining the 'duty of care' agents have towards customers.
- Working in partnership with Women's Aid to campaign for simplified legal options for victim/survivors to remove perpetrators from an ongoing joint tenancy. Working alongside legal experts, an amendment to the DA Bill was submitted that addresses domestic abuse and joint tenancies, as outlined in the briefing Question and Answer Document and in the [National Domestic Abuse and Housing Policy and Practice Group's response\\*](#). While this was successfully tabled as an amendment to the DA Bill by a strong crossbench group of Peers in the House of Lords, it was not brought to a vote based on the government's promise to undertake a public consultation on joint

tenancies and domestic abuse in summer 2021, which the recommendations of will hopefully be included within the most relevant upcoming legislation such as the Renters Reform Bill.

- Developing the Perpetrator Management component of the WHA. The PRS Development Manager chairs the [Perpetrator and Housing Sub-Group](#), connected to the National Domestic Abuse and Housing Policy and Practice group. The group brings together local and national housing and domestic abuse sector partners to influence policy and practice that addresses perpetrator housing. The objectives of the group are outlined on the DAHA website, and includes a paper drafted by the group to the MHCLG outlining key policy objectives with regarding to the new perpetrator strategy through the DA Act and the government's Rough Sleeping Strategy. Going forward, the group will be looking at how a perpetrator housing response fits across tenancy types, including social housing, sheltered/support accommodation, and the private rented sector.
- Lobbying Government on the Covid-19 Reactivation of Possession Proceedings and Domestic Abuse and the risk that this could lead to survivors being evicted, at a time when homelessness services are already overwhelmed. A detailed briefing was prepared for policy makers.
- Working alongside partners at SEA and Women's Aid to begin looking at opportunities to influence through the Renters Reform Bill, particularly regarding joint tenancies, private landlord and letting agent regulation and deposit reforms.

\*See National Group Submission of written evidence to the domestic abuse committee (12th June 2020)

## 2

**Standardised best practice:** To develop a 'gold standard' of best practice for how PRS landlords, letting agents and local authority PRS, Environmental Health Teams should respond to domestic abuse, which will be formalised into a set of DAHA Accreditation Standards. These will be developed, piloted and dissemination and promoted nationally.

Activities delivered:

- Meeting with local authorities Environmental Health and PRS teams to scope feasibility and interest in developing accreditation standards. Mapping processes to gain an understanding of their context and opportunities for carrying out this work.
- Meeting with letting agents to scope the feasibility and interest in developing accreditation standards.
- Meeting with leading property developers and landlords to develop policies, procedures and training to adopt as a part of their domestic abuse response.
- Updating guidance for PRS landlords and resources on [DAHA's PRS webpage](#).
- Developing and delivering a 1-hour awareness session for private landlords
- Speaking on podcasts with Block Management Network and Supported Living Gateway to raise awareness. These podcasts have a following of nearly 3000 block managers and supported living property providers.

## 3

**Education and resource development:**

For PRS landlords/letting agents, tenant/survivors, and DA specialists to access training, information, and resources regarding their role in the PRS response to domestic abuse, and the options and needs of survivors living in PRS..

Activities delivered:

- Partnering with SEA and Law for Life to develop educational resources for survivors living in privately rented accommodation. A 6-week educational course was created for survivors and was trialled with 6 BME services across England. Each service also had an DA Advocate / Practitioner attend to upskill their own knowledge and advocacy in relation to PRS and Social tenancies.
- Working alongside DA Practitioners to develop guidance resources for DA Practitioners to support and advocate for survivors living in the PRS to access safe accommodation.



## 4

**Survivor led approaches:** To amplify the voices of survivors living in the PRS, so that their experiences and needs are central to developing a safe and supportive response. This includes both engaging with individual survivors who wish to share their experience and influence change, but to also promote the development of research that will give a bigger picture of survivors' needs and experiences.

Activities delivered:

- Incorporating learning from the briefing [Policy Evidence Summary 4: Justice, housing and domestic abuse, the experiences of homeowners and private renters](#) prepared for DAHA by Sarah-Jane Walker and Marianne Hester in July 2019. This has formed the basis for all the briefings, lobbying and activities listed above. With more resources, the PRS Lead would be interested in creating an Experts by Experience group that brings together a group of survivors living in the PRS (and other tenancies) to share their experiences and insights on how housing responses can be improved and help us shape our work.
- Partnering with SEA to develop a 'deposits briefing' that focus on the experiences of survivors accessing and maintaining deposits in the private rented sector. This is based on written evidence through the above policy evidence summary, as well as an upcoming focus group consultation with SEA's Experts by Experience Group.
- Using interview feedback from survivor-learners regarding the impact of the Law for Life housing education course for survivors of domestic abuse.

## 5

**Partnerships:** To continue to build relationships with national and local stakeholders in domestic abuse and housing who we will partner with to influence and promote change in policy and practice at a national and local level.

Activities delivered:

- Partnership work this year has been carried out with the following agencies:
  - SEA
  - Women's Aid
  - WHA partnership board
  - Members of the national housing and domestic abuse policy and practice group
  - Shelter
  - National Residential Landlords Association
  - Law for Life
  - Blue Thread property developers
  - Chartered Institute of Housing Scotland and England
  - Legal experts Jenny Beck, family lawyer and co-founder of Beck Fitzgerald and Giles Peaker, a property and housing dispute solicitor and partner of Anthony Gold.
  - Respect and DRIVE programme

## **Domestic Abuse Housing Accreditation support (DAHA)**

The Domestic Abuse Housing Alliance's (DAHA) is a partnership between three agencies who are leaders in innovation to address domestic abuse within housing: Standing Together, Peabody and Gentoo.

DAHA was founded in 2014 in recognition of the important role that housing providers play in the Coordinated Community Response (CCR) to domestic abuse. DAHA's mission is to improve the housing sector's response to domestic abuse and one of the ways it does this is through an accreditation scheme, which offers housing providers a framework and benchmark for how they can respond effectively to domestic abuse. The standards consist of eight priority areas (policies and procedures, case management, risk management, inclusivity and accessibility, perpetrator management, partnership working, staff training, and publicity and awareness) and when embedded, reflect that housing services and providers are on their way to delivering an effective and safe response to domestic abuse.

A home in which someone feels safe is vital and the housing sector is ideally placed to identify, recognise, and prevent domestic abuse in their properties.

A DAHA Development Manager was employed for Cambridgeshire to work with local authority housing services and housing associations.

## From April 2019 to March 2021:

	2019–2020	2019–2020	Total
housing providers initiated the process of implementing DAHA accreditation standards	5	2	7
providers achieved accreditation, including CHS and Cambridge City Council	2	0	2
workshops were delivered and attended by over 200 housing providers. These workshops offer guidance on how to implement the 8 priority areas	12	8	20
local domestic abuse and housing operational group meetings were held to promote a Coordinated Community Response (CCR) and connect providers to work together to implement DAHA's standards.	3	5	8

Dr Joanne Bretherton and Professor Nicholas Pleace from the University of York's Centre for Housing Policy led on a 3-year evaluation to investigate the advantages of DAHA's accreditation. An interim report was published in January 2021. The final report is due for publication in Summer 2021. Both reports can be found here:

[www.dahalliance.org.uk/what-we-do/our-research-publications/](http://www.dahalliance.org.uk/what-we-do/our-research-publications/)

## **Housing First**

Standing Together continued delivering a Housing First service for women by adopting gender-informed practices and working in partnership with specialist domestic abuse services to deliver support and housing associations who provided accommodation units.

A Housing First approach:

- Provides a stable home for people who have experienced homelessness and chronic health and social care needs so they can rebuild their lives,
- Provides intensive, person-centred, holistic support that is open-ended,
- Places no conditions on individuals; however, they should desire to have a tenancy.





## **The Westminster VAWG Housing First Project**

In 2017 Standing Together and Westminster City Council were awarded MHCLG funding for a Housing First and Homelessness Coordinator role. The coordinator spent a year laying the groundwork for establishing a Housing First project for women who have experienced homelessness, any form of VAWG, and multiple disadvantage.

Support is delivered by two Housing First workers employed by [Solace Women's Aid](#) who support up to ten women at any one time. They work to engage and build relationships with the women, support them to access a permanent, independent tenancy, and then provide intensive support to help them maintain that tenancy, and address other aspects such as their physical, and mental wellbeing. As research has shown that violence and abuse is a universal experience for women accessing Housing First projects, this project particularly benefits from the involvement of specialist women's sector provider Solace Women's Aid, who have the knowledge and skills necessary to provide specialist support around domestic abuse and VAWG.

Accommodation units were provided by Peabody, London and Quadrant and Southern Housing Group and Women's Pioneer Housing Association.

Standing Together provide project support as well as coordinating and growing partnerships with registered social landlords (RSLs).

A [separate report](#) was written on the two-year project, which offers an overview of the number of women supported and outcomes achieved.

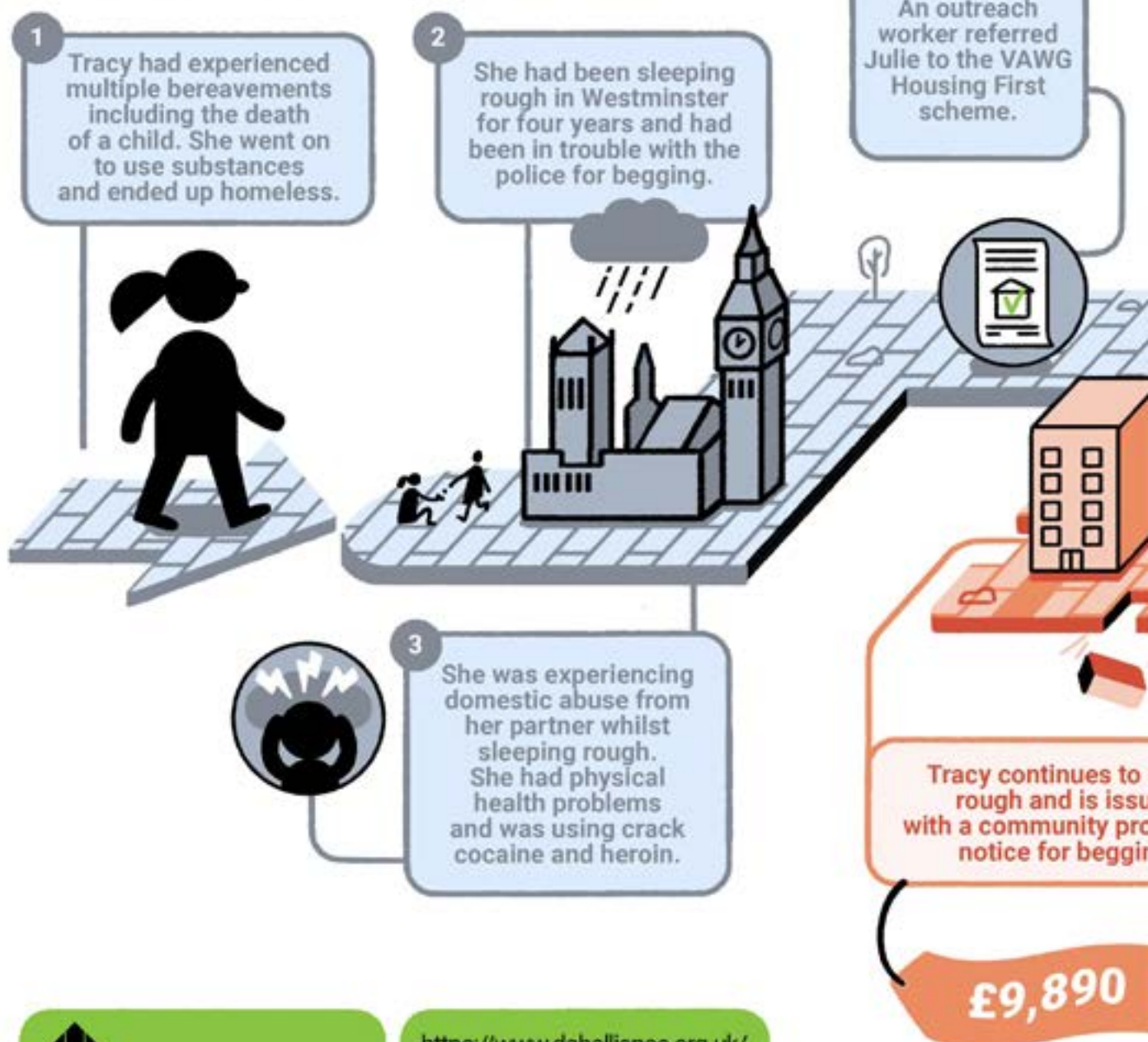
The following case study highlights how a Housing First intervention can support survivors to keep safe whilst maintaining a relationship with the person who is abusive towards them.

# TRACY'S STORY

The actual experience of a survivor supported by the Whole Housing Approach (WHA) project.

**GREEN PATH** - These are the WHA interventions we delivered and associated costs.

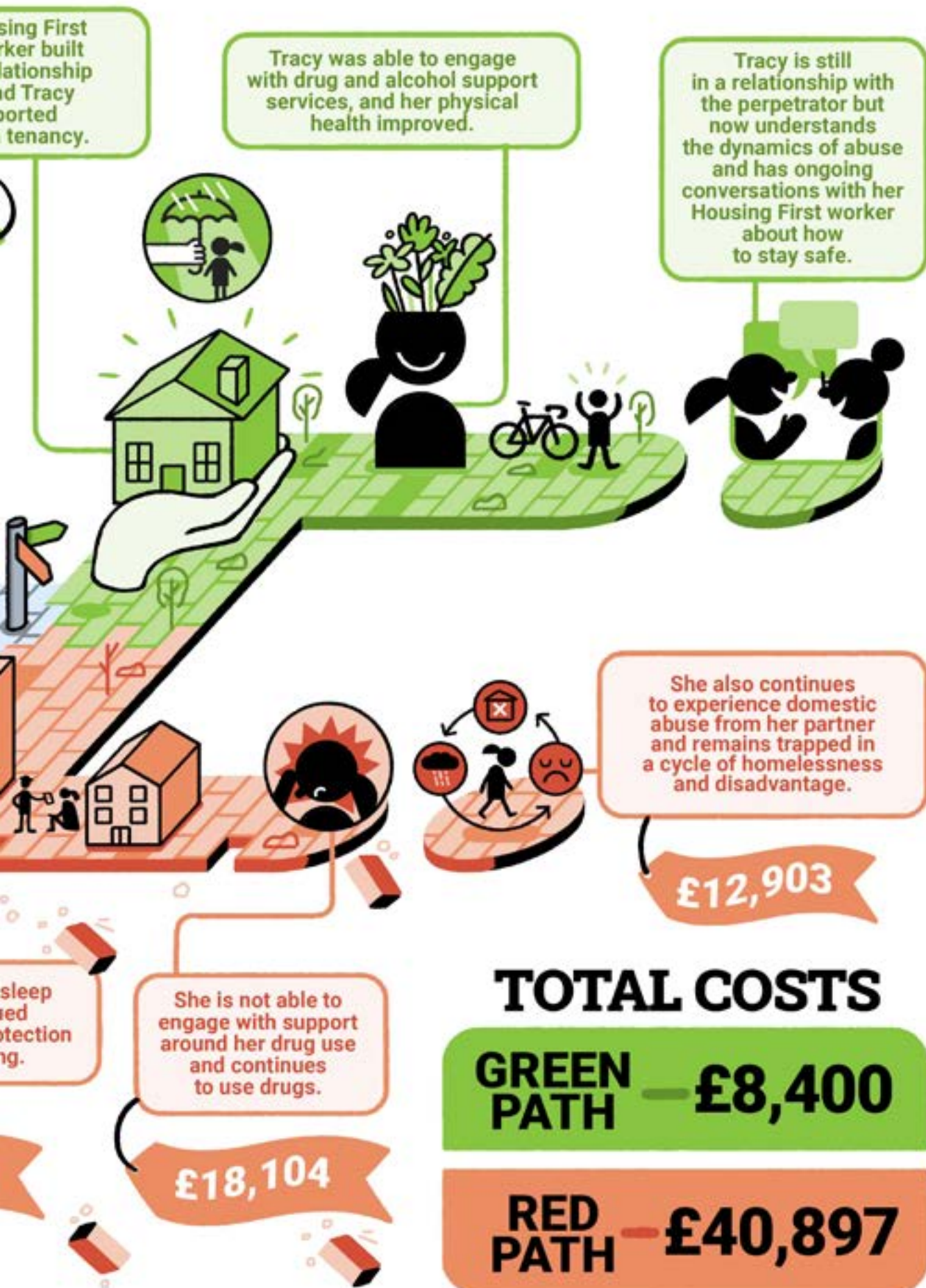
**RED PATH** - These are the likely outcomes and costs prevented or delayed as a result of the WHA.



Whole Housing  
Domestic Abuse

<https://www.dahalliance.org.uk/what-we-do/whole-housing-approach/whole-housing-toolkit/>





# CONCLUSIONS

# AND

# NEXT STEPS



## Key Learning in Year Two

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Year 1 of this WHA pilot focused on defining what good looks like for each of the 12 components, which was captured in the **Online Toolkit** chapters published in March 2020. Year 2 continued investigating this and further explored how the combination of a WHA delivers the best outcomes for achieving safety and stable housing.

In the Year 1 report, we included three **case studies** showing how a WHA intervention can help produce meaningful outcomes for victim/survivors that enables them to sustain freedom and independence from their abuser. Three new case studies were produced in year 2 and included in this report (see pages 36, 46, 56) to showcase other components of the WHA in operation. All six case studies are available on the [WHA toolkit under section 2](#).

A cost benefit analysis (CBA) was applied to five of the case studies and show how a small financial investment can make a significant difference in a victim/survivor being able to access safety and remain free and independent from the perpetrator. Combined, these case studies show a potential total savings of £158,084.50 to the public purse. For every £1 invested, the cost benefit ratio ranged from £3.40 to £68.83, with the mean average saving being £19.16 for each £1 spent.

A sixth case study (Sofina) demonstrates the invaluable second-tier work of SEA (as seen on page 46). A CBA was not applied for this case study as the outcomes achieved for this survivor were the result of SEA's policy and communications work, which was not possible to quantify in the same way as front-line support

and interventions. We did however look at the quantifiable harmful outcomes prevented, the cost of which total £32,114. This figure is likely to be an underestimate of the total costs prevented as some of the outcomes prevented (e.g. the cost to HMCTS of mortgage possession proceedings and cost to mortgage lender of arrears) weren't costed on the Greater Manchester CBA spreadsheet.

The WHA framework by design is **flexible and adaptable**. It can account for variations in the availability of social housing stock, existing CCR partnerships and governance structures, service provision and local need. It is meant to be an adaptive solution that continues to evolve and grow over time, with different components being introduced and growing at different stages. The important role of a WHA Coordinator or equivalent is crucial for local delivery as they act as a linchpin, bringing partners and stakeholders together from across 12 components to consider and deliver consistent, joined up responses that meaningfully address the safety and housing needs of victim/survivors.

**Flexible Funding** was well utilised and was an essential resource for many to break free from their abuser. The fund was accessed most by victim/survivors who had relocated to new

## CONCLUSIONS AND NEXT STEPS

housing and did not have the financial means to make that house a home. Many victim/survivors surveyed as part of this evaluation said that without the funds, they would have been forced to return to the perpetrator. At the time of writing this report, the WHA team had been contacted by several local areas in England asking for advice and guidance on setting up this scheme. This is a promising development that will enable many more victim/survivors to break free and reach safety.

The WHA complements and helps local authorities meet their new duties in the **Domestic Abuse Act** that relate to housing. It enables Tier One Boards and other local governance groups to implement the new duties in connection with each other and with other key strategic initiatives in a local area. It also considers pathways and resources required to support victim/survivors across all tenure types, which may be the first time that safety and housing needs are considered for the private rented sector and private ownership.

### Move On Accommodation

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Move On Accommodation is a newly added component to the WHA. This section offers an introduction to this type of housing option and domestic abuse support that accompanies it. A toolkit guide for Move On Accommodation is in development and will be uploaded to the WHA online toolkit as soon as it's available.

The current Government definition for Move On accommodation, which is used interchangeably with the term second stage accommodation refers to:

**'projects temporarily accommodating victims, including families who no longer need the intensive level of support provided in a refuge, but would still benefit from a lower level of domestic abuse specific support for a period before they move to fully independent and permanent accommodation. There is no expectation that every victim will require this. Many victims are ready to move straight to a permanent new home from refuge. However, move-on and / or second stage accommodation may be helpful in some cases'.**<sup>13, 14</sup>

The Government's [Move On Fund](#) aims to free up refuge spaces by increasing the availability of affordable move-on housing for rent to support victim/survivors of domestic abuse currently living in refuges. The fund in England (outside London) is managed and delivered by Homes England. And in London is managed and delivered by the Greater London Authority (GLA). It includes both capital grant funding and revenue funding for on-going tenancy and domestic abuse support costs.

An ideal delivery model includes a Registered Provider developing new or refurbishing existing accommodation units and a dedicated domestic abuse service accredited by [Imkaan](#) or [Women's Aid England](#) to provide housing management and support services.

Scoping work is underway to learn from the domestic abuse services that have partnered with housing associations to deliver move on accommodation. The Move On Fund and other programmes such as the [Affordable Homes Fund](#) ideally provides the capital required to build new or refurbish existing units. The Move On Fund offers some revenue funds for support while the [funding allocation for Safe Accommodation](#), which is currently only listed for 2021–22 and will be continued beyond this point, is specifically for funding the support element.

Building a trusting and equitable partnership model that works for both partners (domestic abuse services and registered providers) can take time. Both come from entirely different sectors and have different ways of operating with distinct and at times incompatible funding models. Business models must consider the level of risk each partner holds under these arrangements, recognising that domestic abuser services are charity organisations that often rely on inconsistent, insecure, annually awarded funding streams.

A recent [report](#) written by Women's Aid Federation of England and DAHA is based on a project funded by the Home Office to investigate whether there is a need for a national mechanism to 'link up' refuge services and housing providers to improve the move-on process and, if so, how it would work. It includes considerations and recommendations that may be useful for Tier 1 Boards and local authorities to support their planning and delivery of Safe Accommodation Support (Part 4 of the DA Act).



### A note on Supported 'Exempt' Accommodation

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Supported exempt accommodation is a term used in the Housing Benefit Regulations to describe supported accommodation provided by non-profit making organisations where some of the 'normal' HB rules do not apply.

It is not commissioned under local authority homelessness or social care funding, or under specialised supported housing (SSH) arrangements. It utilises the 'exempt' provisions of current Housing Benefit and Universal Credit Regulations to yield rental levels far in excess of private sector Local Housing Allowance Rates and is required to meet a loose regulatory requirement to provide a level of 'care, support or supervision' to claimants.

There are increasing reports of its use to accommodate victim/survivors of domestic abuse. A briefing published by Women's Aid and Imkaan highlights long standing concerns about the lack of clarity in the exempt accommodation regulations, which can and has resulted in poor accommodation and 'care, support or supervision'. Both Imkaan and Women's Aid have heard growing evidence from their members that suggest a concerning increase in exempt accommodation providers establishing supported housing for victim/survivors targeted as 'vulnerable women' with no history, experience or expertise in domestic abuse or VAWG, and no or stated intention in developing this expertise.

The briefing reported many examples of such accommodation where there was no evidence of safety planning or safe practice by support workers in such accommodation. None were familiar with basic structures in place to respond to domestic abuse – including local governance structures like the CCR or initiatives like the Multi Agency Risk Assessment Conference

(MARAC), which is a multi-agency forum where survivors who considered at high risk of harm or homicide from a perpetrator(s) are discussed with agencies working together to safeguard against further harm. In some cases, exempt accommodation providers have not been able to produce very basic evidence of safe practice – including safeguarding and data protection policies, and governance documentation.

The most concerning examples referenced include:

- Inappropriately large providers – such as a 60 bed 'refuge' for women.
- Support is threadbare or non-existent. In some cases, the provider failed to meet the essential definition of a refuge service as listed on [Routes to Support](#).
- As their 'business model' relies on claiming higher levels of Housing Benefit, they are focused on minimising their voids rather than working towards recovery and resettlement. In some cases private property companies are establishing CICs with the purpose of delivering financial return to investors, rather than supporting survivors.

Women's Aid and Imkaan are continuing to work at the national influencing level to raise awareness and lobby for better regulation and guidance on this issue.

Thea Raisbeck is an Honorary Research Fellow at the University of Birmingham and Head of



Research and Best Practice at Spring Housing. She has worked in the housing, homelessness, and domestic abuse sectors for over ten years and combines academic and frontline practice with campaigning and advocacy work.

Thea is currently researching the experiences of women who have experienced rough sleeping, including their experiences of exempt and shared accommodation. She has a particular interest in the management of houses in multiple occupation and the impact of shared living on the wellbeing, safety and rights of vulnerable groups.

Thea's publications on this issue can be found here:

- Exempt from Responsibility? Ending social injustice in exempt accommodation – <https://www.commonwealhousing.org.uk/unregulated-exempt-accommodation>
- Risk, Safety and Wellbeing in Shared 'Exempt' Accommodation in Birmingham, England [https://www.housinglin.org.uk/\\_assets/Resources/Housing/OtherOrganisation/Risk-Safety-and-Wellbeing-in-Shared-Exempt-Accommodation-in-Birmingham-Full-Report.pdf](https://www.housinglin.org.uk/_assets/Resources/Housing/OtherOrganisation/Risk-Safety-and-Wellbeing-in-Shared-Exempt-Accommodation-in-Birmingham-Full-Report.pdf)
- Charter of Rights for Residents of Supported 'Exempt' Accommodation – <https://springhousing.org.uk/wp-content/uploads/2020/12/Charter-Of-Rights-Provider-Guidance.pdf>
- Violence Under Quiet Conditions: Initial Enquiry into Women and 'Rough Sleeping' within Birmingham – <https://www.birmingham.ac.uk/research/chasm/research/housing-communities/research/violence-under-quiet-conditions.aspx>

## Recommendations

It is recommended that local authorities do not fulfil their responsibilities

- Issue a specific direction to local authorities to withhold enhanced housing benefit from providers of specified or exempt accommodation targeting women experiencing DA where:
  - They are making profit or there is evidence of a connection with profit making organisations.
  - Local specialist services providers raise safety concerns.
  - They have no experience/evidence of safeguarding or risk assessment in cases of domestic abuse.
- Strengthen the new National Statement of Expectations for supported housing to enable local authorities to take enforcement in this regard.
- Local authorities and housing services work with their housing benefit teams to ensure these types of accommodation are not offered to victim/survivors and that their policies and procedures, including housing allocations policies, do not inadvertently direct victims/survivors to these providers, especially under the pretence that they are accessing a refuge service or other type of 'safe accommodation' service as defined by Part 4 of the DA Act.
- Tier 1 Boards are encouraged to ensure that Safe Accommodation provision does not inadvertently include this type of accommodation when delivering their responsibilities under Part 4 of the DA Act.
- Policy makers and local governments consider the findings from Thea Raisbeck's work and research and factor this into their policies and procedures.

### What Next?

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To date, we have delivered a handful of components in a local area, which enabled us to define what good looks like for each. Our vision now is to deliver the full range of WHA components and test new ideas for coordinating this model within a county wide setting, in the context of an existing CCR partnership and with the new DA Act and related Housing legislation.

The delivery of further project work in a local area will enable us to continue honing each component of the WHA and the coordination work it requires to keep it in operation. Ongoing updates to the WHA toolkit are needed to ensure that these resources are up to date with the latest legislation and policy. It would also enable new components to be developed and tested, including two components that were added this year (Move On Accommodation and WHA Coordination), both which are in need of a respective toolkit chapter and the development work that goes along with this to uncover best practice models.

The focus on WHA coordination work would look at how we can best bring the components together. This will include establishing a WHA group to bring stakeholders together on a strategic level.

It would introduce and test the idea of a WHA hub, an initiative that would establish pathways into Move On Accommodation, helping to create swifter moves from refuge services and other types of unsafe accommodation. This would consider victim/survivors support needs and ideally offer the provision of Mobile Advocacy and Flexible Funding. The hub could also act as a 'storage facility' for data collected from the Part

4 Needs Assessment, which would offer a wider, WHA insight into local housing needs. Over time, other housing options and initiatives, such as the Managed Reciprocal and Sanctuary Scheme pathways could be added to this hub with associated data collected and stored here.

Our research on the Sanctuary Scheme has identified that there are significant variations in terms of how it is delivered locally if it is offered at all. There is currently no consensus on what makes a Sanctuary Scheme effective. Standing Together has been working with [Professor Rachel Armitage](#) and her team at Huddersfield University, who were at the time of writing about to embark on a national evaluation that will include a review of 15 Sanctuary Schemes operating in England. Based on findings from this evaluation, the WHA delivery team intend to develop minimum standards, which will be published on the WHA online toolkit.

Work on the Perpetrator Management component has remained unfunded to date and leaves a huge area that has yet to be properly explored within a WHA framework. It is imperative that perpetrator programmes are quality assured and hold [Respect's accreditation mark. Funding for perpetrator programmes should also not divert funding away from](#)

[support for victim/survivors, which is currently underfunded.](#) The DAHA PRS Lead is chairing the [sub-group on perpetrators and housing,](#) which acknowledges that perpetrators must be recognised as the cause of harm and to eradicate domestic abuse, we need a holistic response for perpetrators as well as support for victims/survivors. Understanding and addressing how a perpetrator's housing circumstances impacts on victim/survivor safety and housing security, is a necessary element of a holistic response to perpetrators.

The WHA has the potential to transform policy and practice on domestic abuse in the housing sector and offer safer and more meaningful outcomes for victim/survivors. Our vision is that every locality in England will be delivering a WHA, so that victim/survivors in any part of the country have greater choice and have access to a safe and stable home.



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**Contributors and Acknowledgements:** This report draws on research and expertise from a range of contributors. We would like to thank Leanne Taylor (Stockton Council), Gerry Cano (CHS Group), Connie Muttock (Domestic Abuse Commissioner's Office), Sophie Francis-Cansfield (Women's Aid Federation of England), Lucy Hadley (Women's Aid Federation of England), Deidre Cartwright (Standing Together), Stephanie Orr (Surviving Economic Abuse), Mandy Geraghty (Refuge, Cambridgeshire), Angie Stewart (Cambridge Women's Aid), Rennice (Advance), Thea Raisbeck (University of Birmingham), the DAHA team and other Whole Housing Approach delivery partners for their invaluable contribution to this research project.

We would also like to express thanks to those living with and overcoming domestic abuse who have shared their stories with us and who are the reason for our work.