Future Delivery of Support to Victims and their Children in Accommodation-Based Domestic Abuse Services

St Mungo's response

August 2019

St Mungo's
Ending homelessness
Rebuilding lives

About St Mungo's

St Mungo's vision is that everyone has a place to call home and can fulfil their hopes and ambitions. As a homelessness charity and housing association our clients are at the heart of what we do.

We provide a bed and support to more than 2,800 people a night who are either homeless or at risk, and work to prevent homelessness.

We support women and men through more than 300 projects including emergency, hostel and supportive housing projects, advice services and specialist physical health, mental health, skills and work services.

We work across London and the south of England, as well as managing major homelessness sector partnership projects such as StreetLink and the Combined Homelessness and Information Network (CHAIN).

We influence and campaign nationally to help people to rebuild their lives.

For any questions about this submission, please contact catherine.glew@mungos.org.

Summary and key messages

St Mungo's welcomes the opportunity to comment on proposals for the future delivery of support for domestic abuse survivors. Our response comments on the proposed model of support from the perspective of survivors facing multiple disadvantage and survivors who are homeless or sleeping rough. Our response highlights the following key messages:

- The majority of homeless women are survivors of domestic abuse. The risk of domestic abuse and lack of specialist support remains a significant barrier to recovery from homelessness for many St Mungo's clients. Specialist domestic abuse support is crucial to ending women's rough sleeping and homelessness.
- St Mungo's supports the introduction of a new statutory duty on local authorities to assess need for support for all survivors of domestic abuse, and to commission specialist accommodation based domestic abuse services.
- Implementation of the new duty must be supported by sustainable ring fenced funding, clearer definitions of specialist accommodation and support, a robust national oversight mechanism, automatic priority need for survivors, and close working on domestic abuse and homelessness policy and strategy at local and national level.
- In order to reach all survivors, including those facing homelessness and multiple disadvantage, government should also provide additional and separate sustainable future funding streams for specialist community-based domestic abuse support and women-only homelessness accommodation.

Introduction

642 women were seen sleeping rough across England on any one night in autumn 2018, 14% of the total number of people sleeping rough.[1] St Mungo's provided supported housing to 1,216 women in 2017-18.

Domestic abuse is, by its very nature, a housing issue and a core driver of women's homelessness. There is clear evidence of domestic abuse as both a cause and consequence of homelessness. St Mungo's survey data from 2016 shows that at least 54% of female supported housing residents with a history of rough sleeping had experienced violence or abuse from a partner or family member.[2]

Women's interrelated experiences of homelessness and abuse are combined with other experiences of multiple disadvantage. Homeless women are more likely to experience mental ill health, and the average age of death for a homeless woman is shockingly low at 42.[3]

St Mungo's is expert in working with women with multiple interconnected needs, including substance use and mental health problems, who may struggle to access and safely sustain other accommodation options. More than half (51%) of St Mungo's female clients have a substance use support need (alcohol or drugs), whilst 81% have a mental health support need that hinders their recovery or causes them distress.[4] We connect with specialist providers of domestic abuse, substance use and health services in the areas we work in order to access the best possible range of support for our clients.

Funding for refuges and other forms of safe accommodation for survivors - including homelessness provision that meets women's specific needs - remains insufficient to meet demand.[5]

In 2016/17, Women's Aid found that 60% of referrals to refuges (11,867 referrals) were unable to be accepted. This lack of specialist services is particularly felt by women with multiple needs. The charity found that 1 in 10 women were forced to sleep rough whilst waiting for a refuge space, and that women with more support needs were more likely to have to sleep rough while waiting. [6]

Provision of broader specialist domestic abuse support services in the community - including floating support, outreach, drop-ins, peer-support, helplines and Independent Domestic Violence Advisor (IDVA) services - is also insufficient to meet demand. According to analysis from SafeLives, at least 1,120 IDVAs are required to support all victims and survivors at high risk of serious harm or murder across England and Wales. A 2019 survey of practitioners found that just 74% of the required number of IDVAs were in post.[7]

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[1] Ministry of Housing, Communities and Local Government (MHCLG) (2019) Rough sleeping in England: autumn 2018 https://www.gov.uk/government/statistics/rough-sleeping-in-england-autumn-2018

[2] Survey of 1,949 clients who were supported by St Mungo's in a residential service on 15 August 2016.

[3] Agenda, Briefing on Women's Homelessness, January 2019

[4] St Mungo's Organisational Reports, Client Support Needs Overview, Period: 09/07/2018 - 09/07/2019

[5] Women's Aid (2019) The Domestic Abuse Report 2019: The Annual Audit, Bristol: Women's Aid

[6] Nowhere to Turn, Women's Aid, 2018 https://1q7dqy2unor827bqjls0c4rn-wpengine.netdna-ssl.com/wp-content/uploads/2018/06/NWTA-2018-FINAL.pdf

[7] SafeLives (2019) SafeLives' 2019 survey of domestic abuse practitioners in England and Wales http://safelives.org.uk/sites/default/files/resources/SafeLives%E2%80%99%202019%20survey%20of%20domestic%20abuse%20practitioners%20in%20England%20%26%20Wales.pdf

This response comments on the proposed model of support from the perspective of survivors facing multiple disadvantage and survivors who are homeless or sleeping rough.

St Mungo's is a member of the National Housing and Domestic Abuse Policy and Practice group, and we support the joint submission to this consultation by the group.

Recommendations

- St Mungo's supports the introduction of a new statutory duty for local authorities to convene a Local Domestic Abuse Partnership Board to assess the need for support for all survivors of domestic abuse, and commission support for survivors in accommodation-based services, in order to end the postcode lottery for domestic abuse support services.
- The new duty must be accompanied by new ring-fenced funding to support sustainable commissioning of accommodation based support.
- To ensure that this policy has the intended effect, we believe the Government must also amend homelessness legislation to introduce automatic 'priority need' for settled housing for survivors of domestic abuse, so that anyone fleeing domestic abuse in England is guaranteed a safe home.
- There is a lack of clarity in the current definition of accommodation-based services. St Mungo's instead recommends:
    - A narrower definition of domestic abuse accommodation-based support that focusses on refuge accommodation specifically designated for survivors, as the focus of the proposed duty with ring-fenced funding attached.
    - A second, fuller definition of domestic abuse support which covers all kinds of specialist support provided to all survivors living in a range of other settings, with additional and seperate sustainable future funding attached.
- The definition of 'support' is currently too limited. We recommend that a definition of domestic abuse support should cover all accommodation based and community-based specialist support, including outreach and IDVA support for survivors living in all accommodation types. This should include domestic abuse outreach and IDVA support for survivors living in unsafe accommodation and homeless survivors, including those sleeping rough.
- The scope of the current model risks excluding some groups of survivors from specialist support, including those who are homeless or sleeping rough, survivors facing multiple disadvantage and those with no recourse to public funds (NRPF) who cannot currently access safe accommodation.
- The Government should commit to, and provide additional sustainable future funding for, specialist community-based domestic abuse support, in order to reach all survivors, including those who are homeless, sleeping rough, or lack access to accommodation because they have no recourse to public funds.
- There is also a significant need for sustainable future funding for women-only homelessness accommodation as a safe route away from the streets and a gateway to domestic abuse support provided by the specialist sector. This should form part of a new programme of investment in homelessness services with an additional £1bn per year of ring-fenced funding for local authorities to drive a long-term reduction in homelessness and rough sleeping.
- St Mungo's supports close working on homelessness and domestic abuse policy and strategy at both the local and national level.

- A stronger national oversight mechanism should be introduced and resourced to scrutinise domestic abuse support commissioning and outcomes, and particularly in enough detail to understand the impacts on marginalised groups.
- Needs assessment should also be conducted at national and regional level to ensure full coverage of specialist services for marginalised groups, including survivors facing multiple disadvantage.
- St Mungo's appreciates that the provision of support is the focus of this consultation, However, Government must also provide clarity on how housing costs for survivors with NRPF will be met in the new model in order to adequately meet the needs of this group of survivors.
- The need for additional capital funding to establish and maintain safe and high quality accommodation for domestic abuse services should also be considered as part of the new approach.

'Accommodation-based services'

Q1: Do you agree with our definition of 'accommodation-based services' for victims and their children?

Answer: Disagree

We welcome that the consultation recognises the "importance of having support available from a range of accommodation-based services", however the proposed list of accommodation-based services included in the definition is unclear.

St Mungo's supports the Whole Housing Approach developed by the Domestic Abuse Housing Alliance. The approach recognises that survivors are living in all accommodation types and that local areas should provide a full suite of housing options for survivors of domestic abuse. Furthermore, we know that some survivors of domestic abuse lack accommodation because they are homeless or sleeping rough.

Regardless of their housing situation, all survivors should have access to specialist domestic abuse support. Not all effective specialist domestic abuse support is accommodation-based, and there is also considerable unmet need for community-based domestic abuse support for survivors facing multiple disadvantage.

St Mungo's understands the primary purpose of this proposed duty to be to secure the future funding and commissioning of specialist domestic abuse support within accommodation designated for this particular purpose, for example in refuge accommodation.

This is in contrast to specialist domestic abuse floating support or outreach provided to survivors living in other settings, for example in privately owned or rented properties, generic temporary accommodation or in supported accommodation that is not designated specifically for domestic abuse survivors. This includes the use of sanctuary schemes and other enhanced security measures.

This type of support funding is essential, but should be considered separately from funding for specialist refuges, which requires strong protection following dramatic funding cuts and closures. The Bureau of Investigative Journalists found that local authorities across England cut their spending on domestic violence refuges by nearly a quarter (24%) between 2010 and 2017. Over three quarters of councils have reduced the amount they spend on women's refuges since 2010. Meanwhile, the number of domestic violence cases registered by

councils and by the police has risen dramatically over those years, with the number of incidents reported to police also increasing by over a third.[8]

St Mungo's proposes the following:

- A narrower definition of domestic abuse accommodation-based support that focusses on refuge accommodation specifically designated for survivors, as the focus of the proposed duty with ring-fenced funding attached.
- A second, fuller definition of domestic abuse community-based support which covers all kinds of specialist support provided to all survivors living in a range of other settings, with additional sustainable future funding attached.

The Government is right to highlight that survivors in a fuller range of accommodation require support, however we believe the definition of domestic abuse accommodation-based services should be kept limited. A broader definition increases the risk that local authorities will be incentivised to commission lower cost, higher volume accommodation options that lack the specialist knowledge of refuge services. This would be to the further detriment of the specialist sector and survivors.

'Move on and second stage accommodation' is also included within the definition. Move on options are crucial to ensuring people do not become stuck in refuges, putting their lives on hold and utilising vital spaces in already stretched services that may be needed by new clients. However, move on from refuge should be understood as moving into long-term, stable housing, where survivors can rebuild their lives, rather than further temporary move on accommodation.

Limited access to long-term housing solutions for survivors is a contributing factor to the difficulties survivors experience in accessing refuge, causing blockages in the system whereby those currently in refuge are unable to move on and make space for others.

In order to ensure those with experience of abuse and rough sleeping have a Home for Good, the Government should commit to providing grant funding for the building of more homes for social rent. St Mungo's supports research from Crisis and Heriot-Watt University, which suggests that 90,000 new units of social housing will be needed per year in England for the next 15 years to address the housing crisis.[9] In addition, the Government should re-align Local Housing Allowance rates to the cheapest 30% of homes in every area to make private renting more affordable. The rates should rise annually in line with rent increases.

Under the current legislation, people who are homeless due to domestic abuse are not automatically considered to be in priority need for settled accommodation. Instead, people are required to prove they are more vulnerable than an ordinary person would be if made homeless to be owed the main homelessness duty.

Of the 97 women escaping abuse supported by Women's Aid's No Woman Turned Away project in 2017-18 who had approached their local housing team for support, over half (53.6%) were prevented from making a valid homeless application and nearly one quarter (23.1%) were told they were not a priority need despite having multiple vulnerabilities.[10]

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[8] Funding cuts to domestic violence refuges 2010-2017, Open Resources, The Bureau of Investigative Journalism, 2017 https://www.thebureauinvestigates.com/projects/refuges/open-resources

[9] https://www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/housing-models-and-access/housing-supply-requirements-across-great-britain-2018/

[10] Women's Aid, Nowhere To Turn: Findings from the Second Year of the No Woman Turned Away Project. Women's Aid, 2018.

Evidence shows that if survivors are not found to be owed the main homelessness duty of settled accommodation, they are more likely to return to a dangerous situation. Others end up rough sleeping, sofa-surfing or living in unsuitable temporary accommodation where they are at further risk of violence and abuse and are removed from services that would support their recovery.[11]

Automatic priority need should be extended to all survivors, so that anyone fleeing domestic abuse in England is guaranteed a safe home.

Q2: Are there any other services, other than those listed, that you would define as an accommodation based service? If 'Yes', what is this accommodation based service?

Answer: No

For the purposes of the proposed duty and funding for accommodation-based domestic abuse services, St Mungo's believes that the definition of 'accommodation-based services' should be restricted. However, there are three additional areas in which the Government's approach to accommodating survivors requires clarification.

Accommodation for survivors with no recourse to public funds

We welcome recognition by Government that the support needs of survivors with no recourse to public funds or insecure immigration status should be specifically considered by local authorities. However the consultation does not make clear how accommodation for this group will be funded without access to housing benefit.

Refuges tend not to accommodate women with NRPF because of the lack of any certainty as to how long they will have to accommodate women on a rent-free basis. Many services currently do not have the specialist skills to assist women with insecure status, whilst others lack the resources to do so. According to Women's Aid, during 2016/17 only 5.4% of refuge openings would consider applications from women with NRPF.[12]

The consultation points to the Destitution Domestic Violence Concession (DDVC), but this is not available to all migrant women. According to Southall Black Sisters "the DDVC is limited to those who are eligible to apply for the Domestic Violence Rule (DV Rule) only, i.e. those who arrived in the UK with spousal visas only. The government also refers to the National Asylum Support Service (NASS) as a safety net for asylum seekers but makes no mention of the sheer inadequacy of that support. There are significant numbers of abused migrant women who have other types of visas, such as student and work visas with the NRPF condition attached and cannot therefore access NASS support or the DDVC."[13]

Protection from abuse should not depend on immigration status. St Mungo's supports calls from the specialist domestic abuse sector to deliver urgent changes to the eligibility and time limit for the DDVC and DVR.

The Government has previously said that it will consider the argument for widening the cohort of individuals eligible under the DDVC, but that "it will take time to build an evidence base on which to base any decisions." We believe this process should be expedited as far

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[11] 'A Safe Home': Breaking the link between homelessness and domestic abuse, APPG for Ending Homelessness, 2019 https://www.crisis.org.uk/media/240459/cri0198_domesticabusebill_appg_report_2019_aw_web.pdf

[12] Nowhere to Turn, Women's Aid, 2018 https://1q7dqy2unor827bqjls0c4rn-wpengine.netdna-ssl.com/wp-content/uploads/2018/06/NWTA-2018-FINAL.pdf

[13] #ProtectionForAll: Domestic Abuse Bill & Migrant Women briefing, Southall Black Sisters, 2019

as possible in order to prevent women from remaining subject to domestic abuse for longer periods, or from becoming homeless after fleeing an abuser and not being able to access necessary support.

In order for accommodation for those with insecure immigration status to be commissioned by local authorities, they will require assurance that the cost of housing will be reimbursed by national government. One potential option for doing this could be through a flexible national fund, which could be drawn down annually by local authorities based on the level of need in their area.

Accommodation for survivors facing homelessness and multiple disadvantage

Accessing specialist domestic abuse accommodation may not be the most appropriate way for all survivors to access specialist support. For example, survivors with complex mental health and substance use needs are unlikely to be safely able to access mainstream refuge provision.

Women with alcohol, drug use or mental health support needs are more likely to require a refuge which has 24-hour staffing. However the number of spaces in refuges stating they offer 24-hour staffing fell from 796 to 737 during 2016/17.[14] Research from the Women's Aid No Woman Turned Away programme reported that 31% of women with mental health problems and 65% of women with substance use problems were refused an available refuge space because of their needs.

Only 17.3% of all refuge services have a specialist mental health support worker(s), only 8.9% have a specialist drug use worker and only 8.9% have a specialist alcohol use worker.[15]

Accommodation is not safe if a survivor is unable to sustain it because they are unable to meet the expectations and requirements of the service, such as keeping appointments or abstaining from drugs or alcohol. Some clients with multiple needs, including those who have slept rough, need extra support to complete paperwork, attend scheduled appointments, and engage in group activities.

St Mungo's services, and other homelessness accommodation services, offer the flexibility and expertise to safely accommodate people facing multiple disadvantage with personalised support to maintain their accommodation, and make active and ongoing assessments of clients' risk to themselves and others.

St Mungo's provides a wide range of services to prevent and tackle homelessness, and houses women in mixed and women-only environments, including homelessness hostels, mental health supported housing, Housing First and young people's services. 38% of our female supported housing residents live in women-only services, with 62% of women living in mixed supported accommodation. We support and advocate for the right of all women to choose between mixed and women-only services. For many women, women-only services are a necessity, not a preference. They can be vital for the physical and psychological safety of women who have experienced trauma.

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[14] Nowhere to Turn, Women's Aid, 2018 https://1q7dqy2unor827bqjls0c4rn-wpengine.netdna-ssl.com/wp-content/uploads/2018/06/NWTA-2018-FINAL.pdf

[15] The Domestic Abuse Report 2019: The Annual Audit, Women's Aid, 2019, https://1q7dqy2unor827bqjls0c4rn-wpengine.netdna-ssl.com/wp-content/uploads/2019/03/The-Annual-Audit-2019.pdf

St Mungo's offer a range of women-only homelessness services, including offender services working with women in prison and in probation in the female estate, a women's psychotherapy service, women-only emergency shelters and women-only supported accommodation.

We work to support and equip all our staff to recognise and respond to violence and abuse. However, St Mungo's is not a specialist domestic abuse organisation. Survivors engaging with our services still require specialist domestic abuse support, even if they are not able to access accommodation based specialist services.

Women-only homelessness services play a key role in linking survivors with specialist support, either by supporting clients to access local specialist domestic abuse outreach services while living with us, or by preparing clients to access a more structured refuge environment. However, women's specific needs continue to be side-lined in the response to homelessness, and as a result there is a lack of women-only homelessness services nationally.

In 2017, Mapping the Maze research found the majority of local authorities in England (60.6%) have no homelessness services specifically for women.[16] In particular there is a severe shortage of emergency accommodation for women taking the first step off the street. Emergency accommodation provision should include safe, separate spaces for women, who may by further exposed to harm and abuse in mixed accommodation.

The Green Room (Westminster)

The Green Room is an MHCLG funded project, run by St Mungo's. It is a 12-bed Pan-London emergency accommodation service for female rough sleepers who are at risk of or have historically experienced violence.

It provides night shelter and daytime support to women who have experienced severe and complex trauma, and works in partnership with specialist providers.

The service has a flexible/tolerant access policy, with no threshold of engagement and no written warnings or evictions. The service takes referrals from outreach teams, day centres, hostels, health services, prison, probation, refugee and Domestic Violence services. The service works with women with no recourse to public funds.

The service aims to empower women to make positive and informed choices, to support women who have experienced domestic violence to access specialist services and move away from a life on the streets, and to provide a safe space for vulnerable women who are rough sleeping.

The Government's Rough Sleeping Strategy published in August 2018 lacked a gendered approach. Whilst it did recognise the link between women rough sleeping and domestic abuse, there was no mention of women-only provision at emergency stage, no clear articulation that women-only spaces are an issue of safety as well as service effectiveness or women's personal preference, or any acknowledgement that mainstream domestic abuse services can be ill-suited to our client group and no measures to address this gap.

[16] Mapping the Maze: full report, 2017, https://www.mappingthemaze.org.uk/wp/wp-content/uploads/2017/02/Mapping-the-Maze-final-report-for-publication.pdf

Research from St Mungo's and Homeless Link shows that cuts to local authority funding has seen spending on homelessness service shrink by 27% between 2008/9 and 2017/18. This has meant cuts of £590 million a year on average.

For single homeless people[17], the cuts are even worse, with a 53% fall in spending in the same period. This is the result of cuts to 'Supporting People' services which are often about helping people to avoid and escape homelessness. In 2017/18 nearly £1 billion less was spent on Supporting People services compared to 2008/9. During this period, homelessness in England has risen, with rough sleeping up by 165% since 2010.

Recent government funding for homelessness is welcome but fails to come close to replacing what has been lost since 2008/9. More funding is needed to enable local authorities to meet the immediate demand for homelessness services, including supporting more people off the streets. Funding should also be sufficient to plan and deliver services that work to prevent homelessness by supporting people to stay in their homes.

We recommend that funding is restored to the levels invested in homelessness services before the financial crash and enough funding is provided in the future. This means spending an extra £1 billion in each year of the next Spending Review period and beyond if needed.

Given the wider pressure on local authority budgets, there must be a mechanism for ensuring additional funding is targeted at activity to prevent and reduce homelessness. Without this, the money will be spent on other priorities. We believe it should be ring-fenced for homelessness and housing related support services to ensure everyone who is homeless, or threatened with homelessness has a tailored package of support that will help them end their homelessness for good.

This additional funding should be accompanied by a requirement that women-only homelessness accommodation is available to women in every part of the country, either via local commissioning or through cooperation at regional or sub-regional level. This funding should also support the development of psychologically informed environments that offer

St Mungo's South London hostel

The Chrysalis project in South London provides intensive support for vulnerable women, most of whom have experiences of domestic and sexual abuse. The service uses a trauma informed approach, which looks at how past experiences impact upon a person and manifest themselves in actions and behaviour. Clients are given control over the way that they engage with support, and care packages are negotiated between clients and key workers.

The focus is on establishing safety and security. The first stage hostel is a gated property, with CCTV and 24 hour support on site. There are two phases of accommodation in the service, offering a clear progression route towards independence. An Art Therapist attends the project weekly (provided by external agency Street Talk), and clients are connected with statutory support services such as mental health and substance use where available.

[17] Single people and couples without dependent children are the least likely to meet the 'priority need' criteria for housing set out in homelessness legislation, and so we use the term 'single homeless people' to describe those without this legal right to housing.

effective support for those whose homelessness is rooted in repeated traumatic experiences, including violence and abuse.

Women-only homelessness provision plays a crucial role in providing a safe route to help survivors facing multiple disadvantage access specialist domestic abuse support. Sustainable funding for increased women-only homelessness provision will be crucial in order for Government to both address domestic abuse for all survivors and to end rough sleeping for women.

Capital investment for accommodation-based services

Any model for future provision of accommodation-based domestic abuse support should consider the need for additional capital funding to establish and maintain safe and high quality accommodation. As highlighted by Women's Aid, many refuge services are currently provided within buildings that are no longer fit for purpose and particularly exclude physically disabled survivors and those with mobility issues.[18] Capital investment is urgently required to refurbish and build safe, accessible and high quality accommodation for the specialist domestic abuse sector.

'Support'

Q3: Do you agree with our definition of 'support'?

Answer: Disagree

St Mungo's agrees with the statement that domestic abuse support is "the expert help provided to victims and their children in domestic abuse support services*."* We recognise the expertise and value of the support provided by specialist domestic abuse organisations and welcome measures to protect future funding for that support. We agree that a definition of domestic abuse support should include both support provided directly in accommodation based services such as refuges and outreach support provided in other settings. However, we find the definition too limited in scope, as set out in our response to Q4.

Q4: Do you define an accommodation based service not listed here as support? If 'Yes', what is the support service?

Answer: Yes

We believe that a definition of domestic abuse support should cover all accommodation based and community-based specialist support, including outreach and floating support for survivors living in all accommodation types. This should include domestic abuse support for survivors living in unsafe accommodation and homeless survivors, including those sleeping rough.

We are concerned that the definition of 'support' includes no reference to the support provided by IDVAs. IDVA services play a vital role in supporting survivors to access accommodation based support.

It is crucial that IDVA services and domestic abuse outreach and floating support services are resourced and skilled to engage assertively with survivors who are homeless and facing multiple disadvantage. These services must have the flexibility and capacity to work

[18] Women's Aid (2018) Funding a national network of refuges https://1q7dqy2unor827bqjls0c4rn-wpengine.netdna-ssl.com/wp-content/uploads/2018/09/Refuge-Funding-Model-Report-FINAL-WEB-1.pdf

alongside homelessness services to engage with survivors on the streets and in homelessness accommodation.

At present, there is considerable unmet need for IDVA and outreach services that work for survivors who are homeless and those facing multiple disadvantage. SafeLives consultation found that survivors facing multiple disadvantage were often unable to engage with existing local domestic abuse services in the way the services require them to, for example because they may not have a phone or be able to attend regular appointments.[19]

The client group that St Mungo's works with tend to be highly transient. Those with experience of rough sleeping or facing multiple disadvantage can lead 'chaotic' lifestyles and often move around a lot between different types of accommodation. Therefore support, including domestic abuse support, needs to be able to follow the individual rather than be tied to one accommodation service. The support should be trauma-informed, needs-led, holistic, wrap-around support, which moves with survivors to help prevent further repeat victimisation and exposure to further risk.[20]

As part of this wrap-around support, survivors with insecure immigration status should be provided with rights-based information, guidance and support in the visa application for foreign spouses so that they are equipped with the information they need, when they need it.[21]

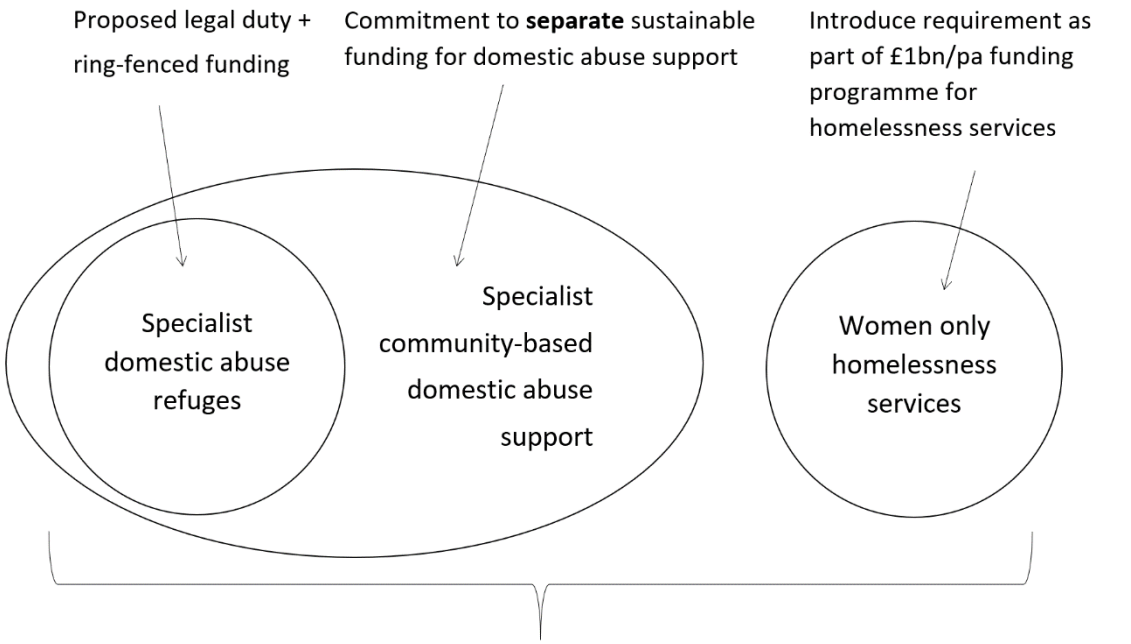
As well as funding the new statutory duty to commission accommodation-based services, the Government should provide sufficient, sustainable funding for specialist community-based domestic abuse support in order to reach all survivors, including those who are homeless, sleeping rough, or lack access to accommodation because they have no recourse to public funds. Without this focus and funding, the Government's proposed approach risks excluding groups of survivors who are particularly vulnerable to harm and further abuse. The Government needs to commit clearly to funding to enable local authorities to meet the new duty, but also to secure funding for the wider programme of support as illustrated by our diagram below.

[19] SafeLives (2018) Safe at Home: Homelessness and Domestic Abuse http://safelives.org.uk/sites/default/files/resources/Safe_at_home_Spotlight_web.pdf

[20] From the Margin to the Centre: Addressing Violence Against Women and Girls, Alternative Bill, Imkaan, October 2018

[21] From the Margin to the Centre: Addressing Violence Against Women and Girls, Alternative Bill, Imkaan, October 2018

Diagram of recommended model



Leadership and responsibilities

Q5: Do you agree with our approach of introducing a statutory duty underpinned by statutory guidance?

Answer: Agree

St Mungo's is in principle supportive of a new statutory duty and guidance designed to protect and resource specialist accommodation based domestic abuse support, provided it is accompanied by sufficient ring-fenced funding to make this support available to all survivors that need it.

We believe that the definition of accommodation based domestic abuse support should be limited (see response to Q1), and that the new duty should also be accompanied by a broader package of funding and guidance to enable commissioning for non-accommodation based specialist domestic abuse support (see response to Q3).

Accountability

Q8. Do you agree with the proposed representation on Local Partnership Boards?

Answer: Disagree

We believe that the proposed representation on Local Domestic Abuse Partnership Boards should be expanded to include senior local authority representatives responsible for homelessness. As highlighted earlier in this consultation, there is clear evidence of domestic abuse as both a cause and consequence of homelessness. Therefore there needs to be a strong connection between commitments to end rough sleeping and tackle domestic abuse,

and strategic alignment between proposed Local Partnership Boards and Homelessness Reduction Boards (or similar statutory or non-statutory local homelessness boards).

Representatives on the Board should reflect and represent the populations they serve, so that they benefit from ongoing understanding of the needs of that population. The recommendation for Tier 1 authorities to 'consider the need for' representation of specialist domestic abuse service providers which meet the support needs of survivors and their children with protected characteristics should be strengthened to require all local authorities not just to consider, but to include, representation from such providers, including the by and for expert sector. This list should also be expanded to include providers working with survivors facing multiple disadvantage.

Q11. Do you agree with a duty to convene a Local Partnership Board?

Answer: Agree

Local partnership working is essential to underpin the 'Whole Housing Approach' and deliver the Government's aim to ensure everyone has a safe place to call home, so we are supportive of the proposed duty to convene Multi-Agency Local Partnership Boards.

However we believe that this proposal should be considered alongside MHCLG's recent proposals to introduce Homelessness Reduction Boards. We remain concerned that current efforts to tackle homelessness and domestic abuse and VAWG are siloed at both national and local level, and that existing accountability structures do not co-ordinate joint activity effectively. It will be essential for future accountability arrangements for domestic abuse and for homelessness to be developed in a joined-up way at both local and national level.

Local Partnership Boards should also be developed with consideration to their relationship to local Health and Wellbeing Boards, and the two should work closely and effectively together to ensure better health outcomes for those affected by domestic violence. People affected by violence are far more likely to experience poor physical and mental health than the general population, and this has a significant financial impact on local healthcare systems. There is a £1.2 billion direct cost to the NHS annually as a result of violence against women and girls; domestic abuse costs an additional £176 million for mental health services alone. Around 50 per cent of women who use mental health services have experienced violence and abuse.[22]

Q12. Do you agree with the role and remit of Local Partnership Boards?

Answer: Disagree

It is important that the remit of Local Partnership Boards extends beyond accommodation-based services alone to include the full range of domestic abuse service provision, including community-based provision.

These services are closely connected, and any local accountability structure should oversee wider domestic abuse and VAWG support provision in addition to accommodation-based domestic abuse services.

Q13. Do you agree with Local Partnership Boards assessing need for services?

[22] Violence and health and wellbeing boards: A practical guide for health and wellbeing boards, NHS Confederation, February 2014, https://www.nhsconfed.org/~/media/Confederation/Files/Publications/Documents/Violence_and_health_and_wellbeing_boards.pdf

Answer: Agree

In principle, we agree with Local Domestic Abuse Partnership Boards being responsible for assessing need for services, providing that the full range of agencies who may have contact with the client group are included in the assessment process, in order for it to be as effective and accurate as possible. These agencies may include, but are not limited to, local homelessness services, drug and alcohol services, and mental health services.

We are clear that needs assessment should also be conducted at a national as well as regional level, to ensure full coverage of specialist services for marginalised groups, including survivors facing multiple disadvantage.

Q14. Do you agree with Local Partnership Boards developing local strategies?

Answer: Agree

We agree that Local Partnership Boards should be responsible for developing and publishing local domestic abuse strategies, and believe that this process should align closely with development of local homelessness strategies.

There should be close involvement of homelessness service providers and other providers working with survivors facing multiple disadvantage in the strategy development process, such as drug and alcohol service providers and VAWG service providers e.g. sexual assault services, exiting prostitution services.

The whole housing approach can only work effectively if both national and local housing and homelessness strategies are aligned with VAWG and domestic abuse strategies.

Q15. Do you agree with Local Partnership Boards commissioning DA services with Tier 2 Authorities?

Answer: Agree

Reducing homelessness should be a priority at all levels of government, local or national. Bringing decision making close to the communities affected has clear benefits in encouraging stronger buy-in and accountability, but there may need to be different structures depending on local dynamics. The priority is to ensure the right people are making decisions in the right places, and in many cases this will necessitate close cross-tier working.

There should also be a requirement for regional or sub-regional working between Local Partnership Boards in order for commissioning to better account for need for services for particular groups of survivors, such as BAME, LGBT, disabled survivors or those facing multiple disadvantage. If a given area doesn't currently provide services for a particular group of survivors it may be very difficult to account for need in that area as it is not currently recorded. It is also vital that survivors have the option to move away from an area that trauma occurred in if they so choose.

Strategies

Q16. Local authority/ providers: What would be the practical implications of meeting the proposed requirements of the statutory duty?

Specialist refuge services are facing a severe funding crisis, with a shortfall of 1,715 bed spaces across England at May 2018 compared to the minimum standards recommended by the Council of Europe.[23]

Secure and sustainable funding is needed to ensure that all survivors and their children can access specialist services who are sufficiently resourced to meet their needs. We recommend the proposed new statutory duty to be underpinned with sufficient and ring-fenced local funding, delivered through the multi-agency partnership board, for specialist refuge provision which meet the needs of survivors from all backgrounds.

Needs assessments

Q18. Do you think that Government should develop a standardised needs assessment form for local areas to use in assessing need for domestic abuse support services?

Answer: Yes

St Mungo's support the recommendation to develop a standardised needs assessment form for local areas to use in assessing need for domestic abuse support services.

The guidance for the needs assessment should make clear that local areas must involve the full range of agencies who may have contact with the client group in the assessment process, in order for it to be as effective and accurate as possible, including those services highlighted in response to earlier questions. The voices of survivors, including those who have experience of homelessness and multiple disadvantage, should be prioritised throughout the needs assessment process.

We recommend that guidance for the needs assessment should equip local areas to actively search for robust and rich data about women's homelessness even where this is not immediately available, as a population group at very high risk of domestic abuse. A 2015 study from Ireland found that as many as 92% of homeless women had experienced violence or abuse during their lifetime.[24]

Women sleeping rough are often missing from administrative datasets collected by homelessness services and other agencies, because there is evidence that they avoid contact with some homelessness services. Research by York University supported by St Mungo's recommends a multiple data point approach, including data merging and survey methods, to identify the specific needs and experiences of women and design more appropriate services in response.[25]

The standardised needs assessment should both draw upon and inform any needs assessment conducted by Homelessness Reduction Boards.

Reporting on outcomes

Q21. Do you agree that standardised reporting would promote accountability and transparency?

Answer: Agree

St Mungo's agrees that standardised reporting would promote accountability and transparency. Data collected through the standardised reporting process should be collected

[23] Women's Aid (2019) The Domestic Abuse Report 2019: The Annual Audit, Bristol: Women's Aid
[24] Maycock et al (2015) Women, Homelessness and Service Provision http://womenshomelessness.org/wp-content/uploads/2018/01/Women-Homelessness-and-Service-Provision.pdf
[25] Bretherton and Pleace (2018) Women and rough sleeping: A critical review https://www.mungos.org/publication/women-and-rough-sleeping-a-critical-review/

in such a way to ensure that data from local areas can be compared and combined to give a national view of need, provisions and outcomes. This would allow enhanced oversight of trends by the Government and providers and enhance public accountability.

Q22. Do you agree with the reporting themes suggested?

Answer: Disagree

One of the reporting themes suggested is “evidence that there is adequate provision for all victims, including BAME, LGBT and disabled victims, as well as those from outside the local area.” We believe that reporting should additionally ask for evidence that the needs of survivors who are homeless or sleeping rough, facing multiple disadvantage, or have no recourse to public funds should be added to this list.

We recommend that any standardised reporting structure should include prompts about the housing and homelessness status of survivors accessing services.

National oversight

Q23. Do you agree with the role and remit of the National Steering Group?

Answer: Disagree

We support the introduction of National Steering Group as a mechanism for ministerial oversight of delivery of support to survivors and their children in accommodation-based services across England. The needs of survivors facing multiple disadvantage, and how well these are being addressed, should be a standing item for the National Steering Group to review.

However, a much more robust national oversight mechanism, will be required to effectively scrutinise commissioning on a regular basis and provide detailed and consistent oversight. This national oversight mechanism should be empowered to hold local authorities to account, making sure that provision under the statutory duty complies with established standards within the specialist sector, including the VAWG Sector Core Standards. The proposed model must be supported with a national needs assessment to make sure that specialist services serving a national need (e.g. for BAME, LGBT survivors) are sufficiently commissioned and maintained.

Q24. Do you agree with the proposed representation on National Steering Group?

Answer: Disagree

Any national oversight mechanism should include a representative responsible for homelessness within MHCLG, and in particular a representative working on the Rough Sleeping Initiative and Rough Sleeping Strategy, to ensure that joint-working between homelessness and domestic abuse as recommended for local authorities is mirrored at the highest level.

Chapter 3: Guidance

Q25. Do you agree with the overall approach of the statutory guidance?

Answer: Agree

St Mungo’s agrees with the overall approach of the statutory guidance. Clearly outlining the expectations Government has for local authorities in delivering their duty will help provide clarity, and could help ensure adherence to, and accountability for, the statutory duty.

However, guidance alone will not ensure safe, consistent and high-quality service delivery for all survivors, which should be monitored by a robust national oversight mechanism.

Q26. What else would you like to have set out in the guidance?

The guidance should highlight the linkages between homelessness and rough sleeping and domestic abuse, and prompt local authorities to consider the housing and homelessness status of those accessing the domestic abuse services that they commission.

Chapter 4: Providing support to all victims and their children

Q28. Do you think that the proposed policy will help local areas ensure the needs of all victims and their children can be met?

Answer: No

At present St Mungo's does not believe that the proposed approach will ensure that local areas are able to meet the needs of all survivors and their children.

While the focus on securing funding for specialist domestic abuse accommodation-based support is welcome, the proposed approach does not adequately support the commissioning of flexible community-based domestic abuse support services. Without these services, the proposed approach cannot hope to reach the most vulnerable groups of survivors, including survivors facing homelessness and multiple disadvantage.

As set out in our response to Q2, without a clear account of how housing costs will be met for survivors for no recourse to public funds the proposed approach also fails to adequately ensure that the needs of this group of survivors can be met effectively.

Q29. What more could the Government do to ensure the needs of victims and their children with protected characteristics are supported?

A national needs assessment should be conducted on a regular basis to make sure that specialist services serving a national need (e.g. for BAME, LGBT survivors) are sufficiently commissioned and maintained. The consultation recognises that "there are some services that serve a national need, for example, dedicated services that support the needs of BAME and LGBT victims and people of faith. Our statutory guidance will make clear that local area needs assessments should take these vital services into account." However we are doubtful that Local Partnership Boards will be able to effectively assess need for these services based on local needs assessments, given the significant lack of current provision precluding demand being identified, and the potential geographical spread of survivors requiring this kind of service.

The current system is clearly not working for survivors from minority groups. As an example, on 1st May 2017, there were just 28 refuge services in England run specifically for black and minority ethnic (BAME) women. Given that 50% of women supported by caseworkers were BAME, this highlights a significant shortfall in specialist BAME refuge services.[26] Women's Aid acknowledge that refuge services led 'by and for' black and minority women have often been the hardest hit by the refuge funding crisis.

The consultation also states that local authorities should assess need and consider the provision of support in accommodation-based services for survivors with insecure immigration status. In order for local authorities to be able to consider this provision,

[26] Nowhere to Turn, Women's Aid, 2018 https://1q7dqy2unor827bqjls0c4rn-wpengine.netdna-ssl.com/wp-content/uploads/2018/06/NWTA-2018-FINAL.pdf

Government should set out clearly how it plans to resource accommodation and support for survivors with insecure immigration status. Current provision for protection for migrant women does not meet the standard to be expected for the Government to fulfil its equality and human rights obligations.