

## Women's Aid Federation of England's Response to the Department for Levelling Up, Housing and Communities' Consultation on Local Connection Requirements

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Women's Aid Federation of England (Women's Aid) is the national charity working to end domestic abuse against women and children. We are a federation of nearly 170 organisations which provide just under 300 local lifesaving services to women and children across the country. Over the past 47 years, Women's Aid has been at the forefront of shaping and coordinating responses to domestic abuse through practice, research and policy. We empower survivors by keeping their voices at the heart of our work, working with and for women and children by listening to them and responding to their needs.

Women's Aid welcomes the opportunity to respond to the Department for Levelling Up, Housing and Communities' (DLUHC's) consultation on regulations to disapply local connection tests for victims of domestic abuse who apply for social housing. Whilst recognising that both 'survivor' and 'victim' can be used interchangeably depending on the context, Women's Aid primarily uses the term 'survivor' and our focus is women survivors, as domestic abuse is a gendered crime. Between the year ending March 2018 and March 2020, 76% of victims of domestic homicide were female and data supplied by 26 police forces showed the victim was female in 73% of domestic abuse-related crimes recorded by the police in the year ending March 2021.<sup>1</sup> It is deeply rooted in the societal inequality between women and men and it takes place 'because she is a woman and happens disproportionately to women'.<sup>2</sup>

Domestic abuse is by its very nature a housing issue, with perpetrators creating a context of fear and curtailed freedom usually within the home, a place where women and children should feel safe.<sup>3</sup> Although each survivors' experience is different, housing is the primary barrier for women attempting to leave abuse<sup>4</sup> - 70% of women responding to a Women's Aid survey said their housing situation and concerns about future housing, including fears of homelessness or lack of safe housing, prevented them from leaving an abuser.<sup>5</sup> Women experiencing domestic abuse face long-term, and often life-long, risks from the perpetrator. Domestic abuse does not end when a relationship ends and research has consistently found that women are at significantly high risk when leaving the relationship.

Often a woman can only access safety when she moves far away from the perpetrator(s). Whereas those who stay within their own homes face significant housing barriers, and are often left 'trapped' with their abuser, for women that need to leave, accessing social housing can be very challenging without 'local connection' to an area. The need to relocate due to abuse is experienced

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<sup>1</sup> ONS (2021) Domestic abuse victim characteristics, England, and Wales: year ending March 2021: Characteristics of victims of domestic abuse based on findings from police recorded crime. Online

<sup>2</sup> United Nations (UN) Declaration on the elimination of violence against women 1993.

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

<sup>4</sup> DAHA (2021) Facts and Statistics. Available online.

<sup>5</sup> Women's Aid. (2020) The Domestic Abuse Report 2020: The Hidden Housing Crisis. Bristol: Women's Aid.

overwhelmingly by women. A large mixed-methods study analysing the relocation patterns of survivors escaping abuse found that out of 19,000 cases per year (2003-2009), the vast majority are women, with 1.3% being men<sup>6</sup>. Furthermore, more than half of the women travelling outside of their local authority area travelled with children.

Local authorities have the power to tailor their allocation priorities to meet local needs and circumstances. The principle of 'local connection' is antithetical to the needs of domestic abuse survivors because it makes access to social housing dependent on an individual's connection to an area. However, we know through our years of expertise that survivors needing to flee abusive homes often have no choice but to rebuild their lives in new areas. Whilst the Government has sought to re-emphasise to local authorities the need to disapply these tests for applications from survivors fleeing abuse, in recent years there has been a growing trend in local authorities introducing 'local connection' rules to tenders, and local refuges being capped on the number of 'non-local' women they are able to accept<sup>7</sup>.

During the Bill stages of the Domestic Abuse Act 2021, Women's Aid worked to highlight these issues and propose an amendment to introduce regulations to disapply local connection tests for victims of domestic abuse who apply for social housing. Unfortunately, as noted above, the strengthening of statutory guidance has not removed the need for stronger regulatory measures which prevent local authorities from applying local connection tests to survivors of abuse. We therefore continue to call for an amendment to the Housing Act 1996, to include a specific bar on local authorities from imposing 'local connection restrictions' on survivors of domestic abuse when accessing refuges and longer-term housing.

It is also crucial to note that the inconsistency in local authorities' understanding of domestic abuse continues to pervade survivors' experience with statutory agencies. To ensure that women and children are not further traumatised when seeking safe and stable social housing, domestic abuse training must be rolled out across local and housing authorities – and it is imperative this is informed and delivered by specialist organisations, including those led 'by and for' Black and minoritised women. The accompanying guidance for changes to the evidence requirements, to qualify for the local connection exemption, must also be developed in consultation with specialist organisations, who are equipped with the expertise needed to ensure the safety of women and children. We are also clear that the regulations adopted should apply equally across the social and private sectors.

Nevertheless, regulations that guarantee local connection exemptions for survivors will not, alone, solve the myriad of barriers women face when accessing social housing. The lack of a secure move-on pathway results in further significant uncertainty and disruption for survivors and their children, as well as significant costs for the local authority in temporary accommodation. We therefore urge the Government to resume research and evaluation, in consultation with Women's Aid and Standing Together, into viable reforms for move-on pathways – specifically the viability of a national mechanism to 'link up' refuge services with housing providers.

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<sup>6</sup> Bowstead, Janet C. Why women's domestic violence refuges are not local services, 2015, <https://www.ohchr.org/>

<sup>7</sup> Women's Aid. (2020) The Domestic Abuse Report 2020: The Hidden Housing Crisis. Bristol: Women's Aid.

**Q2: The government proposes to make regulations to require local authorities to ensure that domestic abuse victims are exempt from any local connection or residency requirements as part of their qualification criteria for applicants for social housing. Do you agree?**

Yes.

Women and children everywhere need safe refuge and stable housing; but they often need them not in their original local area.<sup>8</sup> However, domestic abuse journeys are not about wanting to change location. Survivors of domestic abuse are most often equipped to assess their own safety, and in making complex and dynamic judgements based on their own needs, and often those of their children as well, they are frequently forced into decisions by the abuse they have experienced. Research shows that women fleeing domestic abuse 'stay put' if they can, stay local if they need to relocate, and only cross local authority boundaries if they have to<sup>9</sup>. It is common for several attempts to be made, to ensure safety at home first, for example through gaining civil orders and/or improving home security, however, ultimately relocation is often the only option<sup>10</sup>.

It is therefore unsurprising that far more women in refuge services come from another area than those in community-based services; refuges make up a national network of accommodation-based crisis services and women usually have to travel away from their home area in order to access refuge safely and not be found by a persistent perpetrator<sup>11</sup>. The majority of relocations to refuges are women travelling outside of their local authority area. Women's Aid found that from July 2020 to March 2021, 79.6% of journeys to refuges were from a different local authority.<sup>12</sup>

The process of women and their families uprooting their lives to escape domestic abuse has been described as one of 'forced migration' within the UK<sup>13</sup>. The process of forced migration, experienced overwhelmingly by women and children,<sup>14</sup> should therefore guarantee that survivors fleeing abusive homes should not need to prove their connection to the local area or be subject to any residency requirements, in order to qualify for social housing in the area in which they feel safe.

## Local Connection

The purpose of local connection tests, as part of the qualification criteria for social housing, allows local authorities to prioritise applicants who have well-established local residency or local associations in their area to qualify for social housing. Local connection is usually established where people have lived in an area for at least six months out of the previous 12 months or three years out of the previous five years, or where the applicant may have well-established family or local associations to

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<sup>8</sup> Bowstead, Janet C. Why women's domestic violence refuges are not local services, 2015, [https://www.ohchr.org/Documents/Issues/Women/SR/Shelters/Janet%20C\\_Bowstead\\_Critical\\_Social\\_Policy-2015-Bowstead-327-49.pdf](https://www.ohchr.org/Documents/Issues/Women/SR/Shelters/Janet%20C_Bowstead_Critical_Social_Policy-2015-Bowstead-327-49.pdf), pg331.

<sup>9</sup> Bowstead, Janet C. (2021) "Stay Put; Remain Local; Go Elsewhere: Three Strategies of Women's Domestic Violence Help Seeking," *Dignity: A Journal of Analysis of Exploitation and Violence*: Vol. 6: Iss. 3, Article 4, available at: <https://digitalcommons.uri.edu/dignity/vol6/iss3/4/>

<sup>10</sup> Women's Aid. (2021) *Rail to Refuge: Impact Briefing*. Bristol: Women's Aid.

<sup>11</sup> Women's Aid. (2021) *Rail to Refuge: Impact Briefing*. Bristol: Women's Aid.

<sup>12</sup> Women's Aid Federation of England, *The Domestic Abuse Report 2022: Early Release*, October 2021, <https://www.womensaid.org.uk/wp-content/uploads/2021/10/Domestic-Abuse-Report-2022-Early-Release.pdf>, pg24.

<sup>13</sup> Bowstead JC (2015) 'Forced Migration in the United Kingdom: Women's Journeys to Escape Domestic Violence', *Transactions of the Institute of British Geographers, New Series*, in press.

<sup>14</sup> Bowstead, Janet C. Why women's domestic violence refuges are not local services, 2015, [https://www.ohchr.org/Documents/Issues/Women/SR/Shelters/Janet%20C\\_Bowstead\\_Critical\\_Social\\_Policy-2015-Bowstead-327-49.pdf](https://www.ohchr.org/Documents/Issues/Women/SR/Shelters/Janet%20C_Bowstead_Critical_Social_Policy-2015-Bowstead-327-49.pdf), pg331.

an area. Local connection tests assume a homogeneity of local needs and therefore tailor services to the settled majority. However, the rationale underpinning this policy bears little relevance to the needs of survivors, who must relocate due to domestic abuse. Women and children fleeing to new local authorities to find safety are therefore highly vulnerable to exclusion in areas which prioritise 'local need'.

Whilst the Department for Levelling Up, Housing and Communities (DLUHC) has set out in statutory guidance that it is not reasonable or practical for domestic abuse survivors to be required to satisfy a local connection test in order to qualify for social housing, councils retain discretion to deal with individual cases where 'there are exceptional circumstances'.<sup>15</sup>

Despite the statutory guidance available to local authorities emphasising the need to take account of 'special circumstances' in applying local connection tests, there continues to be considerable variation across the country in how local authorities interpret and adhere to this.<sup>16</sup> Local connection and residency tests continue to be applied – both in the commissioning of refuge services, as well as to wider homelessness duties and housing allocations.

We are clear that regulatory measures are needed to address this issue and ensure that all survivors are able to access safe housing. The introduction of regulations to automatically qualify survivors of domestic abuse for the allocation of social housing in new areas is therefore critical to achieving the Government's ambition of ensuring "*no woman is turned away from the support she needs and that victims get the right support at the right time*".<sup>17</sup>

## Refuges

Government guidance makes clear that locality caps and restrictions should not be written into tenders or contracts for domestic abuse and VAWG.<sup>18</sup> However, this guidance is not consistently applied across England, which continues to lead to a 'postcode lottery' of access to refuge and a major risk to the safe operation of this national network of services. In recent years, Women's Aid has witnessed a worrying trend in local authorities introducing 'local connection' rules to tenders, and local refuges being capped on the number of 'non-local' women they are able to accept.<sup>19</sup>

It is critical to understand that women's refuges are distinctive services that enable women and their children to relocate to escape domestic abuse in a place where they do not have an existing local connection. The very existence of refuges depends on these services' ability to accept women from out of the area, as women will often need to flee from their local area in order to be safe. Therefore, the ongoing use of local connection tests serve to undermine the principles of the needs-based

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<sup>15</sup> <https://www.gov.uk/government/publications/improving-access-to-social-housing-for-victims-of-domestic-abuse/improving-access-to-social-housing-for-victims-of-domestic-abuse>

<sup>16</sup> Women's Aid (2018) *Nowhere to Turn 2018: Findings from the fifth year of the No Woman Turned Away project*

<sup>17</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/844119/2020-21\\_15M\\_DA\\_Fund\\_Prospectus.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/844119/2020-21_15M_DA_Fund_Prospectus.pdf)

<sup>18</sup> <https://www.gov.uk/government/publications/improving-access-to-social-housing-for-victims-of-domestic-abuse/improving-access-to-social-housing-for-victims-of-domestic-abuse>

<sup>19</sup> Women's Aid (2018) *Nowhere to Turn 2018: Findings from the fifth year of the No Woman Turned Away project*

approach of women's refuges, by both refusing refuge to women and children in need, and requiring women to seek refuge more locally than they would otherwise judge to be safe.<sup>20</sup>

## Social Housing

Similarly, Women's Aid remains concerned about reports from specialist domestic abuse services on the inconsistencies between local authorities across England in meeting their obligations to house women fleeing domestic abuse from another local area. The Local Connections guidance advises local authorities to consider the need to provide for other appropriate exceptions from their residency requirements, in order to take account of special circumstances, including providing protection to people who need to move away from another area to escape violence or harm. Crucially, the guidance makes no specific reference to survivors needing to move to new local authorities to escape domestic abuse<sup>21</sup>. The statutory guidance on improving access to social housing for victims of domestic abuse currently seeks to address this omission by encouraging:

*'All local authorities to exempt from their residency requirements those who are living in a refuge or other form of safe temporary accommodation in their district having escaped domestic abuse in another local authority area.'*<sup>22</sup>

However, this is not a requirement and does not apply to women who have not escaped into a refuge or other form of temporary accommodation. As a consequence, in many cases local authorities continue to circumvent their responsibility to house survivors from any area. Of the 166 women supported through Women's Aid's No Woman Turned Away project in 2020, over 30% of those who contacted a social housing team were prevented from making a valid homeless application on the grounds of domestic abuse, for reasons including that they had no 'local connection' to the area.<sup>23</sup>

Furthermore, local authorities often use blanket residency tests in allocation schemes, without accounting for exceptional circumstances – such as for a woman fleeing domestic abuse. This has already been found to be unlawful. In the case of *HA, R (On the Application Of) v London Borough of Ealing [2015] EWHC 2375 (Admin)*, the full homeless duty under Part VII of the Housing Act 1996 was owed to a mother and her five children fleeing domestic violence.<sup>24</sup> Despite the existence of an exceptional circumstances clause in the local authority's allocation scheme, the woman was disqualified from the housing register because she 'failed to meet the residency requirements.' The High Court found that by failing to apply the exceptionality provision, or even consider its application, Ealing had acted unlawfully.<sup>25</sup>

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<sup>20</sup> Bowstead, Janet C. Why women's domestic violence refuges are not local services, 2015, [https://www.ohchr.org/Documents/Issues/Women/SR/Shelters/Janet%20C\\_Bowstead\\_Critical\\_Social\\_Policy-2015-Bowstead-327-49.pdf](https://www.ohchr.org/Documents/Issues/Women/SR/Shelters/Janet%20C_Bowstead_Critical_Social_Policy-2015-Bowstead-327-49.pdf), pg331.

<sup>21</sup> <https://www.gov.uk/government/publications/providing-social-housing-for-local-people/providing-social-housing-for-local-people>

<sup>22</sup> <https://www.gov.uk/government/publications/improving-access-to-social-housing-for-victims-of-domestic-abuse/improving-access-to-social-housing-for-victims-of-domestic-abuse>

<sup>23</sup> Women's Aid (2021) Nowhere to Turn 2021: Findings from the fifth year of the No Woman Turned Away project, available at: <https://www.womensaid.org.uk/wp-content/uploads/>

<sup>24</sup> Women's Aid Federation of England, Standing Together, Domestic Abuse Housing Alliance (DAHA), Chartered Institute of Housing, Local Connection Amendments Briefing (2020), Local Connection Amendments Briefing. Unpublished.

<sup>25</sup> Women's Aid Federation of England, Standing Together, Domestic Abuse Housing Alliance (DAHA), Chartered Institute of Housing, Local Connection Amendments Briefing (2020), Local Connection Amendments Briefing. Unpublished.

Women and their families who have moved to a new area in order to access refuge support are likely to need support in finding move on accommodation. Lack of affordable and appropriate housing options is a major barrier to survivors' independence and recovery from domestic abuse. Decisions in the face of abuse are made in considerable isolation and therefore many women are often not fully aware of their rights and options.<sup>26</sup> As a result of these policies therefore, when women have no local connection to the area, accessing social housing can be very challenging.

Women's Aid warmly welcomed the recognition in the statutory guidance on Part 4 of the Domestic Abuse Act, that: "Access to services should not be restricted by the victim's original locality [in line with relevant guidance on the disapplication of local connection for domestic abuse victims]"<sup>27</sup>.

Nevertheless, evidence shows that the *expectation* for local authorities to make provision for appropriate exceptions on local connection tests for domestic abuse victims is not sufficient in ensuring all survivors of domestic abuse can apply for housing in an area they deem to be safe - irrespective of where they have fled from. Local authorities continue to distinguish between local social housing applicants and those from 'out of area'.

We therefore strongly encourage DLUHC to consider our proposed amendments – set out in our response to the following question – to include a specific bar on local authorities imposing 'local connection restrictions' on survivors of domestic abuse when accessing refuges and longer-term housing.

However, as set out above, survivors will continue to face barriers to housing allocation as a result of residency requirements. We therefore propose a further amendment to guarantee an allocation for survivors, which works in the same way as the statutory provision created to exempt members/ spouses of members of the armed forces from residency requirements altogether. (*The Allocation of Housing (Qualification Criteria for Armed Forces) (England) Regulations 2012*). Survivors of domestic abuse should be awarded the same legal protection. The proposed amendment is set out in Figure 1 below.

***Criterion that may not be used in deciding what classes of persons are not qualifying persons***

- (1) In deciding what classes of persons are not qualifying persons under section 160ZA(7) of the 1996 Act, a local housing authority in England may not use the criterion set out in paragraph*
- (2) The criterion is that a relevant person must have a local connection to the district of a local housing authority.*
- (3) A relevant person is a person who—*
  - a). is or has been a victim of domestic abuse within two years of the date of their application for an allocation of housing under Part 6 of the 1996 Act;*

<sup>26</sup> Janet Bowstead, Why women's domestic violence refuges are not local services, 2015, [https://www.ohchr.org/Documents/Issues/Women/SR/Shelters/Janet%20C\\_Bowstead\\_Critical\\_Social\\_Policy-2015-Bowstead-327-49.pdf](https://www.ohchr.org/Documents/Issues/Women/SR/Shelters/Janet%20C_Bowstead_Critical_Social_Policy-2015-Bowstead-327-49.pdf), pg338.

<sup>27</sup> <https://www.gov.uk/government/publications/domestic-abuse-support-within-safe-accommodation/delivery-of-support-to-victims-of-domestic-abuse-in-domestic-abuse-safe-accommodation-services>

b). *has recently ceased, or will cease to reside in accommodation provided by a local authority in an area in which they have been subjected to domestic abuse and where –*

*(i) the victim of domestic abuse has fled or will flee their local area; and*

*(ii) the purpose of fleeing was or is to escape domestic abuse.*

(4) *In deciding upon the allocation of housing to a relevant person under subparagraph (3), a local housing authority may not consider the location or whereabouts of the perpetrator of the domestic abuse.*

Figure 1: The proposed amendment for the Allocation of Housing (Qualification Criteria for Victims of Domestic Abuse) Regulations 2019.

### **Q5: Do respondents agree that local connection should be defined by reference to Section 199 of the Housing Act 1996?**

No.

The overreliance on the individual will or domestic abuse expertise of local authorities, owing to the significant discretionary powers that they hold in determining who is eligible for local connection exemptions, has proven to be ineffective in guaranteeing survivors access to social housing when fleeing to a new area. If local authorities retain discretionary powers to apply connection tests, survivors fleeing domestic abuse, primarily women and children, will continue to be dependent on the will of social housing providers and left without any guarantee that their housing and safety needs will be met. This heightens women and children's vulnerability to the threat of homelessness and abuse. The Government already requires local authorities to make exemption for certain groups from these local connection requirements, or 'residency tests' – including for members of the armed forces<sup>28</sup> and those seeking to move for work<sup>29</sup>.

As earlier stated, we propose an amendment to include a specific bar on local authorities imposing 'local connection restrictions' on survivors of domestic abuse when accessing refuges and longer-term housing. This is needed to sit alongside DLUHC's statutory duty on local authorities to fund support in refuges and other forms of safe accommodation, under Part 4 of the Domestic Abuse Act<sup>30</sup>. This will ensure that all women and children fleeing domestic abuse can access safe accommodation, where and when they need to. The proposed amendment is set out in Figure 2 below.

*"(1) At the end of section 199 of the Housing Act 1996 (c. 52) (local connection) add –*

*"(12) A person who is or is likely to become a victim of domestic abuse, is not required to have any local connection to any authority within the meaning of section 199(1) of this Act for the purposes of his or her application".*

<sup>28</sup> The Allocation of Housing (Qualification Criteria for Armed Forces) (England) Regulations 2012

<sup>29</sup> The Allocation of Housing (Qualification Criteria for Right to Move) (England) Regulations 2015

<sup>30</sup> <https://www.gov.uk/government/publications/domestic-abuse-support-within-safe-accommodation/delivery-of-support-to-victims-of-domestic-abuse-in-domestic-abuse-safe-accommodation-services>

Figure 2: Proposed amendment for section 199 of the Housing Act 1996 (c. 52)

In addition to the above, there does not appear to be a section of the Housing Act 1996 that defines 'domestic abuse'. Therefore, it would be useful to include an amendment defining the term at a relevant point in the Housing Act 1996, in the same terms as Part 1, Section 1 of the Domestic Abuse Act<sup>31</sup>.

**Q6: Do respondents consider that exemptions of local connection or residency tests for domestic abuse victims should be time limited? If so, what length of time is appropriate, when should the period begin, and who should make that assessment?**

No.

The proposal of a time limit implies there is a limited and set time after which a survivor is no longer at risk. Such an interpretation of safety undermines the definition of domestic abuse under Part 1, Section 1 of the Domestic Abuse Act, which recognises that domestic abuse is not just physical or sexual violence, but can include emotional abuse, coercive or controlling behaviour and economic abuse<sup>32</sup>. The Act also recognises that controlling and coercive behaviour can occur post-separation. This landmark change better reflects the reality of domestic abuse, which has long-lasting economic and emotional impacts on survivors<sup>33</sup>.

The serious and long-term physical and psychological effect of domestic abuse creates severe barriers to work for some survivors. If a survivor escapes, particularly to a refuge, the need to protect her identity often means she cannot safely continue working because the perpetrator would find her. Women in refuge are generally unable to work for the short transitional period of their refuge stay, due to numerous safety, health and practical issues. Lack of access to economic resources can result in a victim staying with an abusive partner for longer and experiencing more harm as a result<sup>34</sup>. It is therefore critical that they can seek housing in new local authority areas without the additional fear of a time limit imposed on their eligibility to be housed in a new area.

Survivors can continue to be at risk from abusers long after leaving the relationship, and victims are at a heightened risk of homicide in this period<sup>35</sup>. The Femicide Census found that in 2017, 55% of women killed by their ex-partner or ex-spouse during the year were killed within the first month of separation, and 87% in the first year<sup>36</sup>. Data from the Domestic Homicides Project, which examined deaths considered to be a domestic homicide or suspected victim suicide with a known history of domestic abuse since 23rd March 2020 and 31st March 2021, also shows female suspected suicide victims are even more likely than intimate partner homicide victims to be previously known as victims of high-risk domestic abuse involving coercive control. Coercive control, including in relation to economic abuse,

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<sup>31</sup> <https://www.legislation.gov.uk/ukpga/2021/17/section/1/enacted>

<sup>32</sup> [Domestic Abuse Act 2021 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2021/17/part/6/crossheading/controlling-or-coercive-behaviour)

<sup>33</sup> <https://www.legislation.gov.uk/ukpga/2021/17/part/6/crossheading/controlling-or-coercive-behaviour>

<sup>34</sup> Earlywhite, M. and Stohl, I. (2005) *In Our Shoes: The Next Steps*, Washington: State Coalition Against Domestic Violence

<sup>35</sup> Home Office (2016), *Domestic Homicide Reviews: Key Findings from Analysis of Domestic Homicide Reviews*

<sup>36</sup> Long, Dr J., Harper, K. and Harvey, H with Ingala Smith, K. (2018). The Femicide Census: 2017 findings.

commonly continues post-separation and attempted or actual separation is shown to be a factor in a sizeable number of cases of victim suicide.

It is also important to understand the interdependencies of different forms of abuse in creating an environment where a survivor might feel the need to return to their abuser. Lack of access to economic resources post-separation is the primary reason women return to an abusive partner<sup>37</sup> and makes the process of rebuilding an independent life challenging. A vital part of the support that services provide to survivors for their housing needs is ensuring they have safety plans in place post-separation<sup>38</sup>. It is also important to recognise that women from religious communities can face further forms of post-separation abuse from separate legal systems. Black and minoritised women are more likely to suffer abuse from multiple family members as well as their partners and fathers which impacts their level of isolation and ability to maintain child contact post-separation.<sup>39</sup> Given the long-lasting and wide-ranging impacts that different forms of domestic abuse have on women and children, it is not appropriate to impose any time limit to the proposed regulation for the disapplication of local connection tests. We therefore strongly discourage DLUHC from imposing a time limit for which domestic abuse survivors are exempt from local connection tests.

It is also worth noting that there is no real benefit for local authorities to impose time limitations for which exemptions from residency tests would apply. Due to the migration patterns of domestic abuse survivors, there are no strong flows between particular local authorities<sup>40</sup>. Women leave everywhere due to domestic abuse and are recorded as travelling from every English local authority, and from other nations to access formal support services in England. Women using services have a diverse range of needs and take different journeys to safety, freedom and independence<sup>41</sup>. There is also a strong tendency for women and their families to relocate to the same type of place they were forced to leave.<sup>42</sup> As a result, the average 10,000 domestic abuse journeys made each year have been shown to cancel each other out in terms of net effect on a local or national scale.<sup>43</sup> Therefore, time limits on domestic abuse exemptions for residency requirements would not alleviate the pressures on local housing enough to merit their imposition.

**Q7: Alternatively, do respondents consider, instead of having a time limited exemption, that we should provide for ensuring exemptions from local connection or residency tests apply where the need to move to a new area relates to reasons connected with domestic abuse?**

Yes, however, consideration needs to be given to what the evidence threshold will be for survivors to prove they are a victim of domestic abuse. Please see our response to question 11 for further detail.

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<sup>37</sup> ANZ/MIT University (2016) *MoneyMinded Impact Report: The Role of Financial Education in a Family Violence Context*

<sup>38</sup> Women's Aid (2019) *The Domestic Abuse Report 2019: The Economics of Abuse*. Bristol: Women's Aid.

[Economics-of-Abuse-Report-2019.pdf \(womensaid.org.uk\)](#)

<sup>39</sup> Thiara, R.K. & Gill, A. (2012) *Domestic Violence, Child Contact and Post Separation Violence: Issues for South Asian and African-Caribbean Women and Children; A Report of Findings*. London: NSPCC.

<sup>40</sup> Janet Bowstead, *Why women's domestic violence refuges are not local services*, 2015, [https://www.ohchr.org/Documents/Issues/Women/SR/Shelters/Janet%20C\\_Bowstead\\_Critical\\_Social\\_Policy-2015-Bowstead-327-49.pdf](https://www.ohchr.org/Documents/Issues/Women/SR/Shelters/Janet%20C_Bowstead_Critical_Social_Policy-2015-Bowstead-327-49.pdf)

<sup>41</sup> Women's Aid (2018) *Survival and Beyond: The Domestic Abuse Report 2017*. Bristol: Women's Aid.

<sup>42</sup> Janet Bowstead, *Why women's domestic violence refuges are not local services*, 2015, [https://www.ohchr.org/Documents/Issues/Women/SR/Shelters/Janet%20C\\_Bowstead\\_Critical\\_Social\\_Policy-2015-Bowstead-327-49.pdf](https://www.ohchr.org/Documents/Issues/Women/SR/Shelters/Janet%20C_Bowstead_Critical_Social_Policy-2015-Bowstead-327-49.pdf).

<sup>43</sup> Janet Bowstead, *Why women's domestic violence refuges are not local services*, 2015, [https://www.ohchr.org/Documents/Issues/Women/SR/Shelters/Janet%20C\\_Bowstead\\_Critical\\_Social\\_Policy-2015-Bowstead-327-49.pdf](https://www.ohchr.org/Documents/Issues/Women/SR/Shelters/Janet%20C_Bowstead_Critical_Social_Policy-2015-Bowstead-327-49.pdf).

**Q8: Do respondents agree that the proposed exemption to local connection and residency tests should extend to social housing applications made in England where the victim has fled from elsewhere in the UK?**

Yes.

There is a need for survivors to travel locally as well as nationally to reach safety. The majority of relocations to refuges are women travelling outside of their local authority area. A large mixed-methods study analysing the relocation patterns of survivors escaping abuse found that out of 19,000 cases per year (2003-2009), there were “10,000 women (over half with children) migrating across local authority boundaries to access services and nearly 9,000 relocating within their local authority.”<sup>44</sup> Bowstead found that from 2008-2009, over 70% of women’s journeys to refuges were from outside their local authority.<sup>45</sup> While more up-to-date research is required, this indicates that the journey is also likely to be long and, as a result, of a high cost.

Research also demonstrates that women are recorded as travelling from every English local authority and from other nations to access formal support services in England. Accounts of survivor journeys indicate that where and how far they went were determined by a range of factors, including their judgement of where they could be safe, the availability (or not) of refuge spaces, and the practicalities of travel<sup>46</sup>. Some women may be required to travel a significant distance in order to be safe, particularly women from tight-knit Black and minoritised communities, and women in smaller towns who can be easily found by their perpetrators in the region they are coming from<sup>47</sup>. Overall, the distances travelled range from under ten miles in total, to thousands of miles for two women who had left partners abroad; and whilst a quarter had travelled under 40 miles so far, a quarter had travelled over 200 miles so far<sup>48</sup>. There is clearly considerable variation in the needs and distances survivors must travel to seek refuge and transition into safe and settled independent lives.

Therefore, to ensure that all women have the autonomy to assess their own risk, and decide which area is safest for them to rebuild their lives, the proposed exemption to local connection and residency tests should extend to social housing applications made in England where the victim has fled from elsewhere in the UK.

**Q9: Do respondents agree that the proposed exemption from local connection and residency tests should be applied to domestic abuse victims in privately rented accommodation, privately owned housing, and temporary accommodation? If not, please explain why.**

Yes.

For many women, including the most vulnerable and those at crisis point, the only way to escape an abuser(s) is to leave their home and find a place in a refuge service. A refuge service offers a safe

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<sup>44</sup> Women’s Aid. (2021) *Rail to Refuge: Impact Briefing*. Bristol: Women’s Aid.

<sup>45</sup> Janet Bowstead, *Why women’s domestic violence refuges are not local services*, 2015, [https://www.ohchr.org/Documents/Issues/Women/SR/Shelters/Janet%20C\\_Bowstead\\_Critical\\_Social\\_Policy-2015-Bowstead-327-49.pdf](https://www.ohchr.org/Documents/Issues/Women/SR/Shelters/Janet%20C_Bowstead_Critical_Social_Policy-2015-Bowstead-327-49.pdf), pg338.

<sup>46</sup> Idib.

<sup>47</sup> Smith, k and Miles C (2017) *Nowhere To Turn: Findings from the First Year of the No Woman Turned Away Project*. Women’s Aid: Bristol.

<sup>48</sup> Bowstead JC. 2017. *Segmented journeys, fragmented lives: Women’s forced migration to escape domestic violence*. Journal of Gender Based Violence Women’s Aid Response to DLUHC Consultation on Local Connection Requirements

place to stay run by specialist domestic abuse staff. Residents receive a planned programme of therapeutic practical support from staff and access peer support from other residents.

Once they are ready to leave the refuge, women then need to be able to find suitable, stable housing that enables them to move on and rebuild their lives. For women recovering from trauma, it is particularly important that they live somewhere they feel safe, with access to the support and facilities that they need for long-term recovery for themselves and their children. For those survivors who, for a variety of reasons, are not able to or do not want to go to a refuge service, it is equally critical that they are able to find safe and suitable housing.<sup>49</sup> This may mean staying in their own home with relevant support from specialist domestic abuse organisations based in the community, or moving to a new home. They may need to stay in temporary accommodation at first – this might be emergency accommodation arranged by their local authority or staying with family. For survivors with no recourse to public funds because of their immigration status, options are further limited by not being eligible for state assistance with emergency housing or for housing-related state benefits<sup>50</sup>.

In areas where women want to go into the private rented sector (PRS), specialist services can support this transition. However, the experiences of front-line practitioners shows that this is only a viable option where the service has strong relations with the local authority in which the accommodation is being sought. If a woman wants to move to a different area, they face significant challenges, with roughly 80% going into registered social landlords and housing associations in one area.<sup>51</sup>

Furthermore, in areas where there is a social housing shortage crisis, the private housing team may also procure properties from the private sector for use as temporary accommodation and as part of a final offer made where a duty under the Housing Act 1996 has been accepted. Temporary accommodation provided by a local authority (in this context through the 'interim duty to accommodate') can take many forms but includes hotels, Bed and Breakfast accommodation, private lets and 'dispersed' forms of accommodation. Furthermore, as has been well documented, funding for refuges and other forms of safe accommodation for survivors remains insufficient to meet demand, as are resources for community-based services<sup>52</sup>. Approaches which support survivors to stay safe in the PRS, and to maintain social housing tenancies, are an essential part of the picture. However, moving elsewhere depends on being able to either buy a new place, secure social housing or access housing in the PRS.

Survivors already face significant barriers in the private rented route because, for most women, it is not affordable within the local authorities they are operating in. Particularly for women claiming housing-related benefits, survivors experience discrimination because of the 'no benefits' policy adopted by many private landlords or state benefits not covering the cost of private rental properties. This is part of what the charity Shelter has termed 'DSS discrimination'.<sup>53</sup> One respondent in our

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<sup>49</sup> For example, there may not be a suitable space available in a refuge or she may not know about refuge options. She may not be eligible for state benefits because of her immigration status and therefore few refuge spaces are accessible to her (the housing element of refuge services is usually funded by housing-related state benefits).

<sup>50</sup> Women's Aid. (2020) *The Domestic Abuse Report 2020: The Hidden Housing Crisis*. Bristol: Women's Aid.

<sup>51</sup> Women's Aid, DAHA, (2020), Focus Group Evidence informing: Improving the move-on pathway for survivors in refuge services. Available at: [improving-the-move-on-pathway-for-survivors-in-refuge-services-wa-daha.pdf \(dahalliance.org.uk\)](https://www.dahalliance.org.uk/wp-content/uploads/2020/08/improving-the-move-on-pathway-for-survivors-in-refuge-services-wa-daha.pdf)

<sup>52</sup> Women's Aid (2019) *The Domestic Abuse Report 2019: The Annual Audit*, Bristol: Women's Aid

<sup>53</sup> Beales, G. (August 2018) *Ending DSS Discrimination*. Shelter. Webblog. Available from: <https://blog.shelter.org.uk/2018/08/ending-dss-discrimination/>

Survivor Voice survey (2019) said she went to over 40 letting agents but found no landlords willing to accept benefits<sup>54</sup>. It should also be noted that survivors are frequently being placed in unsuitable temporary accommodation, sometimes for long periods of time. One caseworker reported in 2020, that she had come across cases 'where women are in temporary accommodation for five years.'<sup>55</sup> It is critical that any 'temporary' accommodation therefore, is provided to women and children fleeing abuse, in an area they feel safe.

Women and children in privately rented accommodation, privately owned housing, and temporary accommodation need to be exempt from any additional barriers which would prevent them from rebuilding their lives in safe accommodation. Women's Aid therefore supports proposals that would exempt survivors of domestic abuse from local connection and residency tests when accessing all forms of accommodation, including privately rented accommodation, privately owned housing, and temporary accommodation.

**Q11: Is there a need for further statutory guidance with regards to collecting evidence of domestic abuse to support local authorities when considering applications for social housing, to make sure the vulnerabilities of the victim and needs of the local authority are balanced. If so, what might this include?**

Yes.

Currently, it is not clear in the existing guidance what is required of survivors to demonstrate that they are a victim of domestic abuse. Proving 'vulnerability' can be traumatic and near impossible for many survivors. We are concerned that without clear guidance on this, many local authorities will continue to circumvent their obligation to house women fleeing domestic abuse from another local area, or even subject survivors to further trauma.

Both housing providers and specialist domestic abuse services have raised significant concerns that the evidence requirements to prove instances of abuse is extremely high, because they need to balance the rights of survivors and perpetrator. The high evidential requirements for survivors to prove they meet the conditions for exemption from local connection tests, places a high burden on women to evidence their experiences of domestic abuse, which often compromises a their safety and wellbeing. Women's Aid's *Nowhere to Turn* report (2021) found that, of the women supported by the project's specialist practitioners who contacted social services while searching for a refuge space, the responsible teams failed to meet their obligation to safeguard women and children in at least 34% of cases. As a result, advocacy from the No Woman Turned Away (NwTA) team was required to hold them to account<sup>56</sup>.

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<sup>54</sup> Women's Aid. (2020) *The Domestic Abuse Report 2020: The Hidden Housing Crisis*. Bristol: Women's Aid.

<sup>55</sup> Women's Aid. (2020) *The Domestic Abuse Report 2020: The Hidden Housing Crisis*. Bristol: Women's Aid.

<sup>56</sup> Women's Aid (2021) *Nowhere to Turn 2021: Findings from the fifth year of the No Woman Turned Away project*, available at: <https://www.womensaid.org.uk/wp-content/uploads/>

Survivors continue to highlight concerns that a lack of understanding about the nature of domestic abuse continues to pervade their experiences with housing providers when seeking support.<sup>57</sup> The concerns were also echoed by front-line practitioners in a series of focus groups held by Women's Aid on *Improving the move-on pathway for survivors in refuge services*.<sup>58</sup> In these sessions, participants highlighted the persistent lack of understanding from housing authorities in responding to reports of domestic abuse.

Although the Homelessness Code of Guidance for local authorities now includes reference to the new definition of domestic abuse, under Part 1 of the Domestic Abuse Act,<sup>59</sup> in practice, landlords are often unable to identify abuse without 'evidence' of physical harm. Cases are often not treated seriously by landlords until they reach a point perceived to be a 'crisis'. Intervention from local specialist domestic abuse services is therefore often required to 'level up' the understanding of domestic abuse within local authorities and advocate on behalf of the survivor<sup>60</sup>. This means specialist services need to spend significant resources and time mediating with landlords, because of their inadequate level of understanding about abuse.

The new statutory definition of domestic abuse, under Part 1 of the Domestic Abuse Act, now emphasises that domestic abuse is not just physical or sexual violence, but can include emotional abuse, coercive or controlling behaviour and economic abuse<sup>61</sup>. This landmark change better reflects the reality of domestic abuse. Whilst training programmes like *DA Matters* are being rolled out through police forces across the country to improve responses to controlling and coercive behaviour,<sup>62</sup> social housing landlords are not subject to the same specialist training and often fail to taking seriously reports of coercive behaviour, which is a criminal offence.

Women's Aid therefore strongly encourages DLUHC to ensure the changes delivered to 'priority need' in the Domestic Abuse Act 2021 are accompanied by robust training from specialist domestic abuse services to housing officers. All training should be delivered in collaboration with specialist domestic abuse organisations, such as Women's Aid and Imkaan, with quality assurance and key points of accountability built in.<sup>63</sup>

The specific experiences and needs of Black and minoritised women results in survivors from the Black community being disproportionately impacted by poor responses to domestic abuse from statutory agencies. Owing to the campaigning work of Sistah Space, a specialist domestic abuse

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<sup>57</sup> Women's Aid (2021) *Nowhere to Turn 2021: Findings from the fifth year of the No Woman Turned Away project*, available at: <https://www.womensaid.org.uk/wp-content/uploads>

<sup>58</sup> Women's Aid, DAHA, (2020), *Improving the move-on pathway for survivors in refuge services*, A Recommendations Report. Available at: [improving-the-move-on-pathway-for-survivors-in-refuge-services-wa-daha.pdf](https://www.womensaid.org.uk/wp-content/uploads/2020/07/Improving-the-move-on-pathway-for-survivors-in-refuge-services-wa-daha.pdf) ([dahalliance.org.uk](https://dahalliance.org.uk))

<sup>59</sup> <https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities/chapter-21-domestic-abuse>

<sup>60</sup> Women's Aid's Member Focus Group Sessions on the Impact of Joint Tenancies on Domestic Abuse Survivors, March 2022. Unpublished.

<sup>61</sup> [Domestic Abuse Act 2021 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2021/1/section/1)

<sup>62</sup> [Police training: Domestic Abuse Matters - Womens Aid](https://www.womensaid.org.uk/our-approach-change-that-lasts/trustedprofessionals-scheme/)

<sup>63</sup> The Women's Aid Change That Lasts approach includes the Trusted Professional scheme, aimed at front-line practitioners that work in the public and voluntary sector, and are likely to be in contact with survivors of domestic abuse. See: <https://www.womensaid.org.uk/our-approach-change-that-lasts/trustedprofessionals-scheme/>

organisation led 'by and for' women with African heritage, Valerie's Law was recently heard by the Government on the 29<sup>th</sup> March 2022. Women's Aid strongly encourages DLUHC to consider proposals for mandatory cultural competency training in the police and other statutory agencies, as set out by Sistah Space.

It is highly unlikely that anyone would falsely claim to be a victim of domestic abuse for the purpose of accessing social housing.<sup>64</sup> Whilst more up-to-date research is needed in this area, evidence suggests that false allegations of domestic abuse and sexual violence are also low. For example, a CPS review of the number and nature of cases involving allegedly false allegations of rape, domestic violence, or both, found that in 2011 and 2012, there were 5,651 prosecutions for rape and 111,891 for domestic violence. During the same period there were 35 prosecutions for making false allegations of rape, six for making false allegations of domestic violence and three for making false allegations of both rape and domestic violence<sup>65</sup>.

However, in cases where local authorities feel it is appropriate to collect evidence to determine whether domestic abuse has taken place, the burden of proof should always be minimised to reduce further harm inflicted on survivors. Evidence requirements should meet the existing criteria set out by the Government for domestic abuse such as the requirements for legal aid or child maintenance service exemptions<sup>66</sup>. This threshold of proof is currently adopted in Wales, where local authorities may seek statements from domestic abuse organisations a survivor has been in contact with, landlords or family and friends<sup>67</sup>. We would welcome the opportunity to work with DLUHC to ensure that the forthcoming changes to evidence requirements are informed by experts, with a specialist understanding of the women and children these measures are designed to serve.

### **Q13: Are there any barriers that prevents neighbouring local authorities from working together to support domestic abuse victims and their families applying for social housing outside their area?**

Yes.

In addition to the lack of available spaces, refuge providers face significant challenges in resettling women and children who are ready to leave their service. A previously largely consistent pathway from refuge into secure – often social – housing, has been undermined by the lack of available social housing, other unaffordable forms of housing and the impact of welfare benefit changes. The result is that women and children now often leave refuge and move into another form of temporary, move-on or second stage accommodation. The challenges with move-on also mean that women and children ready to leave refuges are not able to, blocking spaces for survivors who need to escape (bed

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<sup>64</sup> Levitt, A. (2013) *Charging perverting the course of justice and wasting police time in cases Involving allegedly false rape and domestic violence allegations*. CPS

<sup>65</sup> Levitt, A. (2013) *Charging perverting the course of justice and wasting police time in cases Involving allegedly false rape and domestic violence allegations*. CPS

<sup>66</sup> <https://www.gov.uk/legal-aid/domestic-abuse-or-violence>

<sup>67</sup> Shelter (2019) 'Domestic abuse and homelessness' Available at: <https://sheltercymru.org.uk/get-advice/families-and-relationships/domestic-abuse/domestic-violence-and-homelessness/>

blocking) and compounding the overall availability of spaces. Even within the pathways that do exist, there remain severe inconsistencies in local arrangements and wider barriers and challenges that survivors, services and housing providers face. In May 2021, Women's Aid and the Domestic Abuse Housing Alliance (DAHA) held a series of workshops, funded by the Home Office, which investigated 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. In these sessions, we gathered insights into current arrangements for rehousing survivors, the barriers and challenges to doing this, and how effectively the proposed solution would work.<sup>68</sup>

Of the existing arrangements for move-on, local choice-based lettings systems, which enable people on the council's housing list to bid for council and housing association properties, were the most common. However, there is significant variation in how lettings systems work to support survivors who need to move-on from refuge services. Traditionally, owing to the variation in whether councils consider women leaving refuge as requiring reasonable and additional preference on the grounds that they are homeless - as a result of violence, the bidding process for properties takes a long time for survivors.<sup>69</sup> We welcome the changes under section 78 of the Domestic Abuse Act, which states that a person who is homeless as a result of domestic abuse against them is in 'priority need' for housing. Nevertheless, we remain concerned about the consistency across councils in adhering to the new provisions and guidance under the Act.

In some areas, there are specific 'second stage' accommodation arrangements, which provide longer-term accommodation for survivors leaving refuge. 'Second-stage' accommodation can be provided in a range of different types of accommodation - including groups of flats or single rooms with shared kitchens, and dispersed move-on houses - all with varying levels of support. This arrangement can facilitate a quicker move on from refuge into 'second-stage' and offer ongoing support between tenancies from a trusted, expert domestic abuse worker. The process of establishing a partnership and business model between a Registered Provider and domestic abuse service for 'second-stage' accommodation can be lengthy, in particular when negotiating conditions for ensuring a 'sustainable tenancy' and liability for arrears and voids.

There are also some refuge and housing providers who successfully establish arrangements where direct housing lets are offered to women requiring move-on from refuge services, which can be from local authorities, but most commonly derive from housing associations. These arrangements appear to provide the most net benefits for all parties involved, as they are underpinned by a supportive working relationship between refuge and housing providers. In some cases, specialist services can work with local authorities to establish 'long term temporary accommodation' with five to ten year leases on properties, which are offered to women and children ready to leave refuge. In our focus groups, this was considered to be a significant improvement from leaving women on the 'waiting list' in the local authorities letting scheme.

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<sup>68</sup> Women's Aid, DAHA, (2020), Improving the move-on pathway for survivors in refuge services, A Recommendations Report. Available at: [improving-the-move-on-pathway-for-survivors-in-refuge-services-wa-daha.pdf \(dahalliance.org.uk\)](https://www.dahalliance.org.uk/wp-content/uploads/2020/06/Improving-the-move-on-pathway-for-survivors-in-refuge-services-wa-daha.pdf)

<sup>69</sup> Women's Aid, DAHA, (2020), Improving the move-on pathway for survivors in refuge services, A Recommendations Report. Available at: [improving-the-move-on-pathway-for-survivors-in-refuge-services-wa-daha.pdf \(dahalliance.org.uk\)](https://www.dahalliance.org.uk/wp-content/uploads/2020/06/Improving-the-move-on-pathway-for-survivors-in-refuge-services-wa-daha.pdf)

However, the direct lets model is rarely employed by local authorities, largely because nominations agreements between local authorities and Registered Providers need to be approved by the local authority, which impacts the lettings activity of Registered Providers in a local area.<sup>70</sup> The number of properties that a local authority is entitled to through nominations agreements varies between areas and impacts whether, and how many, direct lets can be made to survivors who need to move-on from refuge. DAHA's consultation with providers showed that the percentage of properties given to the local authority can range from 100% to 0%, with the most common being 75%.<sup>71</sup>

Overall, there is a plethora of arrangements in place across local authorities in England to deal with the social housing needs of domestic abuse survivors. The inefficiency and fragmentation of current approaches to move-on accommodation suggests that more coordinated and consistent pathways would help to alleviate pressures on the demand of local housing, as well as stabilise survivors' journeys to settled and independent lives. The existing model is also financially unviable, incurring significant costs in temporary accommodation. In 2017-18, councils spent just under £1 billion (£996 million) on temporary accommodation for homeless households.<sup>72</sup>

Clearer local authority allocation schemes are therefore needed to transform our response to the housing needs of survivors. Clearer allocation schemes would ensure survivors are consistently prioritised for all pathways in place, including through direct lets and local choice-based lettings schemes. Following Women's Aid's workshops, co-facilitated with DAHA, as well as an analysis of national move-on data conducted in Autumn last year, we proposed a national mechanism that would 'link up' data on move-on accommodation demand, with housing associations who have 'direct let' vacancies when women and children are ready to leave refuges.

We noted that this would require a database where refuge providers could enter anonymous information – such as family size; accessibility requirements; and location preference – which would be shared with housing providers so they could identify suitable vacancies for families requiring move-on accommodation. Critically, this mechanism would not seek to undermine pre-existing positive local arrangements or working relationships, but *would* benefit areas with inconsistent and complex arrangements. The successful implementation of such a mechanism would rely on strong and safe data sharing practices, which the domestic abuse sector already has<sup>73</sup>. Women's Aid strongly encourages the Home Office and DLUHC to consider facilitate, through additional funding, a continuation of the joint work undertaken by Women's Aid and DAHA's in 2020 to further explore the viability of a national mechanism to improve move-on pathways for survivors fleeing domestic abuse.

Leadership at both national and local level is crucial for ensuring local allocation schemes are consistent and effective in enabling move-on from refuge. Our workshops identified that specialist domestic abuse organisations and housing providers – as well as the Housing Regulator and other

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<sup>70</sup> An agreement between the Council and the Registered Provider (RP) by which the occupation of the Affordable Housing Units is approved by the Council and therefore affects the letting activity of a RP in that local authority.

<sup>71</sup> Women's Aid, DAHA, (2020), Improving the move-on pathway for survivors in refuge services, A Recommendations Report. Available at: [improving-the-move-on-pathway-for-survivors-in-refuge-services-wa-daha.pdf](https://dahalliance.org.uk/wp-content/uploads/2020/12/Improving-the-move-on-pathway-for-survivors-in-refuge-services-wa-daha.pdf) ([dahalliance.org.uk](https://dahalliance.org.uk))

<sup>72</sup> In 2017-18 councils in England spent 1.394 billion on homelessness. MHCLG, Local authority revenue expenditure and financing England: 2017 to 2018, Revenue outturn housing services (RO4), LA drop-down.

<sup>73</sup> In the workshops, there was a broad consensus in agreement on the importance of ensuring compatibility between databases. Specific reference was also made to existing systems – such as Routes to Support and On Track – as a providing the basis for this.

agencies – are operating with different motivations in this area. Further work is therefore critical to developing an effective model that works. In respect of this, we recommend that a pilot project is established, within a Whole Housing Approach framework, for a ‘move-on hub’ within at least two cross-border local authorities. This hub, alongside our proposed national mechanism, would support the establishment of new or existing pathways to move on from refuge, and ensure that ongoing revenue funding is delivered for support services that ensure tenancy sustainment. Women’s Aid would welcome the opportunity to meet with DLUHC to further explore viable ways of reforming move-on pathways in England and ensure that we maximise the findings from our previous joint work on this.