



Submission to the Department of Communities and Local Government and Department of Work and Pensions Consultation on Funding for Supported Housing, February 2017

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These are the views of:	<i>Welsh Women's Aid (Third Sector) - the national charity in Wales working to end domestic abuse and all forms of violence against women.</i>

1. About Welsh Women's Aid:

1.1 Welsh Women's Aid is the national charity in Wales working to prevent domestic abuse and all forms of violence against women and ensure high-quality services for survivors that are needs-led, gender-responsive and holistic.

1.2 Established in 1978, we are an umbrella organisation that represents and supports a national federation of 23 local independent charities delivering specialist domestic abuse and violence against women prevention services in Wales, as part of a UK network of provision. These specialist services constitute our core membership, and they provide lifesaving refuges, outreach, and community advocacy and support to survivors of violence and abuse - women, men, children, families - and deliver innovative preventative work in local communities. We also deliver direct services including the Welsh Government funded Live Fear Free Helpline; a National Training Service; refuge and advocacy services in Colwyn Bay and Wrexham; and the national Children Matter project which supports local services to help children and young people affected by abuse and to deliver preventative STAR group work in every local authority in Wales.

1.3 We have been at the forefront of shaping coordinated community responses and practice in Wales, by campaigning for change and providing advice, consultancy, support and training to deliver policy and service improvements for survivors, families and communities. As a national federation, our policy work, consultancy, training and advocacy is all grounded in the experience of local specialist services and service users. Our success is founded on making sure the experiences and needs of survivors are central to all we do.

Welsh Women's Aid welcomed the UK government's announcement in September 2016 to exempt refuges from local housing benefit cap and to explore alternative arrangements to support a network of refuge provision for survivors and children impacted by violence against women, domestic abuse and sexual violence. There is now an opportunity to develop a long term sustainable solution to the funding of refuge services.

1.4 Welsh Women's Aid welcomes the opportunity to respond to this consultation. Our response focuses on **Question 12: We welcome your views on how emergency and short term**

accommodation should be defined and how funding should be provided outside Universal Credit. How should funding be provided for tenants in these situations?

2.0 The definition of refuge services as a specialist form of emergency and short term accommodation.

2.1 Refuge services offer physical and emotional safety, support, advocacy and practical help. Refuge-based services form part of a UK network of provision that enables families to have 24-hour access to refuge-based services and move between refuges if needed. Refuge-based support delivers a planned programme of therapeutic and practical support, above and beyond a safe place to stay, and access to peer support from other survivors. This includes 24-hour access, information and practical help, individual and group support, safety planning, counselling, support and advocacy with housing, finances including benefits/debt, health and well-being, parenting, immigration, legal, criminal and family justice systems, education and employment. The service is designed to meet, and is led by, the needs of survivors and their children, and is delivered by support workers (including dedicated support workers for children and young people) trained and experienced in violence against women, domestic abuse and sexual violence, in an environment which empowers women and children and promotes their autonomy and self-determination. This should also include resettlement support which helps survivors move on to rebuild their lives and establish themselves in local communities.

2.2 As defined by UK Refuges Online, “a refuge offers accommodation and support which is tied to that accommodation. The address will not be publicly available. It will have a set number of places. Residents will receive a planned programme of therapeutic and practical support from staff and access peer support from other residents. This will include: access to information and advocacy; emotional support; access to specialist support workers (e.g. drugs/alcohol misuse, mental health, sexual abuse); access to recovery work; access to support for children (where needed); practical help; key work & support planning (work around support needs including e.g. parenting, finances and wellbeing); safety planning; and counselling.” (UKROL, 2017)

2.3 Refuges provide emergency accommodation and specialist support to survivors of violence against women, domestic abuse and sexual violence. Many refuge providers have developed this specialism over decades of providing support to survivors and their children, building up unique knowledge and expertise in delivering effective needs-led support that can achieve long term outcomes. Feedback from survivors has highlighted that specialist services (that offer gender responsive provision) are essential in order for support to be effective and achieve desired outcomes. *“If a generic provider picked up our domestic abuse service, I don’t think women would approach them because they wouldn’t feel safe enough. You need specialist training and knowledge to deal with the unspoken areas that come up when working with women. Without specialist knowledge you can’t pick up on those signals to support her effectively and safely.”* Specialist domestic abuse service provider in Wales.

2.4 Welsh Women’s Aid recommends that the UK Government recognises the distinct specialist emergency accommodation and support that refuges provide to survivors and their children. There needs to be clear definition of refuge provision as outlined above. Without this recognition there is the threat of greater competition for funding and the funding of generic provision that not only does not meet the needs of survivors and their children but also could be unsafe.

3.0 Fair access to funding for all client groups.

3.1 A new system of funding needs to ensure it enables all survivors to have access to the refuge provision they need including refuges that can meet specific needs. This should include the

recognition to fund specific support for BME women. In Wales 36% of those accessing refuge in 2015-16 identified as not White British. This highlights a great need for refuges that are able to provide specific support for BME survivors and their children.

3.2 All survivors and children experiencing domestic abuse need access to refuge provision, regardless of their immigration status or income. In recent focus groups survivors have fed back to Welsh Women's Aid that due to the current funding arrangements some survivors and children experiencing domestic abuse face barriers in accessing refuge accommodation because of their lack of entitlement to housing benefit. This includes survivors earning over the housing benefit eligibility allowance but not able to afford the rent or without access to their money due to the abuse they are experiencing. This also includes survivors with an insecure immigration status including asylum seekers, students and EU citizens who may have no recourse to public funds and therefore be ineligible for housing benefit.

3.3 Welsh Women's Aid recommends that a sustainable solution to the funding of refuges needs to ensure that all survivors and their children can access refuge provision that is based on their need and not on their eligibility to benefits.

4.0 Current constraints of funding for refuge provision from housing benefit.

4.1 The current funding from housing benefit is a vital source of income covering a large proportion of rental costs and service charges. On average housing benefit provides 91% of weekly housing costs and 55% of total yearly income for refuge providers in Wales (Welsh Women's Aid, 2016).

4.2 The proposed capping of housing benefit for refuges at local housing allowance rates would have led to the widespread closure of refuge services. Feedback from refuge providers in Wales noted that 79% stated that the cap would have had significant consequences for their services including reducing service levels with 69% reporting they would have had to close (Welsh Women's Aid, 2016). This highlights the vulnerability of refuge provision to further changes across government departments and across devolved administrations.

4.3 It is widely acknowledged that the current funding system does not adequately support the provision of refuge services to meet the needs of all survivors and their children at the point of crisis and beyond across the UK. Survivors are already being turned away from refuge due to there being a lack of refuge space at the time that they needed it and where they need it. Nearly half of survivors refused a space (388 survivors, 48% of survivors refused refuge in 2015-16), were turned away because the refuge-based support they wanted to access was full at the time they needed support. Having no space in the refuge was the most common reason that survivors referred to the service were unable to access refuge. If local funding requirements put further restrictions on the allocation of space, this would increase the number of survivors turned away at point of access.

5.0 Inflexibility of Universal Credit as an option for funding access to refuge

5.1 The inflexibility of Universal Credit which is calculated and paid out on a monthly system of assessment and payment is a serious constraint on refuge provision. Refuge services will not be able to recover rent payments from Universal Credit where someone has moved out prior to the payment being made making it a highly unsustainable method of funding refuge provision. The rapid turnaround of the majority of survivors in entering refuge and moving on demonstrates the need for a funding mechanism that can work at a similarly rapid response. 2015-16 data from specialist services in Wales showed that 53% of survivors were accommodated and supported for one month or less, 15% for 2 months with only 8% staying in refuge for over 6 months. Universal Credit payment

schedules and waiting times will not respond rapidly enough to be an effective mechanism by which to support survivors in covering the cost of a refuge. Universal Credit will create major difficulties for refuges in covering their housing costs.

5.2 Welsh Women's Aid recommends that the funding solution for refuge is completely separated from the Universal Credit mechanisms to ensure that it enables the services are resourced to allow for rapid provision of support to survivors at their point of crisis. This should be recognised as significantly different for refuge provision in comparison to other forms of short-term accommodation.

6.0 Sustainable funding for a national UK network of refuge services

6.1 The UK government's plan for supported housing needs to ensure funding will still support a national network of refuges that a survivor and their children can access wherever and whenever they need to. Any funding decision made in regards to the national network of refuge services needs to acknowledge the potential impact on the network, not just across local authorities in England but also within Wales.

6.2 Many survivors need to travel beyond their local area to escape their abusive partner to ensure the safety of themselves and their children. While refuges often receive funding from local mechanisms, they also operate collectively within a national network. Within the UK we have an established national network of refuges that has been developed over many decades that enable survivors to access refuge where they need it regardless of where they currently reside. Access to this national network is facilitated across the UK so that survivors can move between local authority areas and across the 4 nations of the UK to enable them to have access to the full range of refuge support services that the UK can offer in a place that is safe for them to do so.

6.3 The starting point for a new funding mechanism for refuge provision must focus on the sustainability of a national network to meet the needs of all survivors and their children rather than be reactionary to the consequences of the implementation of Universal Credit and a current inadequate funding mechanism. The new funding mechanism needs to be developed within a realistic timescale and should not be confined by the timescale of the roll out of Universal Credit. This will be particularly important for refuges in Wales as the devolution of the fund to the Welsh Government will require further time to develop a funding model in Wales that cannot be determined until after this consultation is completed and any agreement has been made to devolve the fund.

6.4 The Department for Work and Pensions, Department for Communities and Local Government and Welsh Government should work with specialist domestic abuse organisations, including Welsh Women's Aid, to develop the future sustainable funding model.

6.5 Welsh Women's Aid recommends that the UK Government ensure a sustainable future for the life-saving national network of refuges that allows women and children survivors of domestic abuse to flee violence and work towards safety, independence and freedom. Consideration should be made of bespoke, separate model of housing funding for refuge is required to uphold the UK Government's commitment to ensure 'no woman is turned away' from the help and support they need when fearing for their lives and fleeing domestic abuse. This should include clear provision that enables the sustainability of refuges in Wales and work with the Welsh Governments to ensure a sustainable funding model across the UK.

7.0 Sustainable funding model for refuge provision in Wales.

7.1 Both the UK and the Welsh government have commitments to support refuge services and it is essential that this joint commitment is utilised to develop a sustainable funding model, as currently funding comes from a range of devolved and non-devolved sources. The Violence Against Women and Girls Strategy 2016-2019, and supporting National Statement of Expectations, sets out the UK government's clear commitment to provide this form of specialist refuge support and ensure that "no victim is turned away from accessing critical support services delivered by refuges." Similarly the Welsh Government's National Strategy for Violence against Women, Domestic Abuse and Sexual Violence includes the priority to "develop a model for sustainable funding for the provision of specialist services." To ensure that these objectives are met, a joined-up approach from both governments will be needed so that Welsh refuge services have the same opportunities as other refuges in the national network to access sustainable long term funding.

7.2 In Wales local strategies are currently being produced as well as needs assessments for commissioning being carried out without a clear picture of how this funding will impact on the resources available to support provision. There are concerns that commission and funding decisions will be made that may not be sustainable, a long term solution that can provide a sustainable source of funding for refuges is needed to provide a bedrock to effective responses to violence against women, domestic abuse and sexual violence.

7.3 Welsh Women's Aid recognises that the funding should be ring-fenced to provide long term stability however we are concern as to how the ring fencing will be maintained in the longer term. The UK government has stated that a new funding model will ensure that supported housing continues to be funded at the same level it would have been in 2019/20. This does not allow for increases in rent charged by landlords that are passed onto service providers, or for inflationary increases in service charges, for example in energy costs. The new funding arrangement should also look to improve on the current provision and aim to allow for the increase in provision when necessary to meet demand rather than restricting provision further over time.

7.4 If funding is devolved to the Welsh Government to allocate, the administration costs must be included. We are concerned that any funding devolved to the Welsh government is allocated to be used to fund direct services and is not further reduced in Wales to cover the administration costs of allocating the fund, therefore additional money will be needed to support the administration of the fund.

7.5 The solution to funding refuges must provide a mechanism for a sustainable long term programme of funding for a minimum 3 year period would provide improved financial security, allow for more effective business planning and governance as well as reducing the administrative burden on services.

7.5 Welsh Women's Aid recommends that funding is devolved to the Welsh Government. Wales has responsibility for delivering the Violence Against Women, Domestic Abuse and Sexual Violence Act (Wales 2015) including a national and local strategies as well as homelessness legislation. It is vital that Wales is able to plan service provision to meet strategic aims and international treaty obligations. This should include sufficient resources to administer the funding in Wales to ensure the equivalent funding remains available to direct provision.

Welsh Women's Aid would like to thank the Department for Work and Pensions and the Department for Communities and Local Government for the opportunity to comment on this important consultation and we look forward to working together in the future.

Any comments or questions regarding our response can be directed to:

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