



**Live Fear Free Helpline**  
 Llinell Gymorth Byw Heb Ofn  
 Providing confidential support and information on domestic abuse, sexual violence and violence against women in Wales  
 Darparu gwybodaeth a chellogeith cyfrinachol ynghylch trais domestig, trais rhywiol a trais yn erbyn merched yng Nghymru

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**Welsh Women's Aid**  
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**Submission to the Department of Communities and Local Government and  
 Department of Work and Pensions**

***Funding Supported Housing: Policy Statement and Consultation***

***Section 3: Consultation on housing costs for short-term supported accommodation***

**Closing date: 23 January 2018**

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<b>These are the views of:</b>	<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>

**About Welsh Women's Aid:**

Welsh Women's Aid is the umbrella membership organisation in Wales that supports and provides national representation for 27 independent third sector violence against women, domestic abuse and sexual violence (VAWDASV) specialist services in Wales (our membership of specialist services).<sup>1</sup> These services deliver life-saving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence, as part of a network of UK provision.

As an umbrella organisation, our primary purpose is 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. We collaborate nationally to integrate and improve community responses and practice in Wales; we provide advice, consultancy, support and training to deliver policy and service improvements across government, public, private and third sector services and in communities, for the benefit of survivors. This includes advising and supporting commissioners and strategic leads in

<sup>1</sup> Our membership of 27 third sector VAWDASV specialist services in Wales, with whom we have national partnership agreements to ensure our work is coordinated and integrated: *Aberconwy DAS, Atal y Fro, Bangor and District Women's Aid, Bawso, Clwyd Alyn Housing Association (CAHA) Women's Aid, Stepping Stones, New Pathways, Safer Merthyr Tydfil, Carmarthen Domestic Abuse Service, Calan DVS, Cardiff Women's Aid, Cyfannol Women's Aid, Domestic Abuse Safety Unit (DASU), Glyndwr Women's Aid, Gorwel (Grwp Cynefin), Hafan Cymru, Llamau, Montgomeryshire Family Crisis Centre, Newport Women's Aid, North Denbighshire Domestic Abuse Service, Port Talbot & Afan Women's Aid, RCT Women's Aid, Safer Wales (including Dyn Project), Swansea Women's Aid, Threshold (formerly Llanelli Women's Aid), West Wales Domestic Abuse Service and Rape; and Sexual Assault Centre North Wales.*



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their development of VAWDASV needs assessments and strategic plans, promoting evidence for innovative new service models, and supporting research into the prevention of abuse.

Some of the many umbrella services we deliver include facilitating the involvement of member services' in relevant policy, legislative and strategy developments and encouraging co-production in service development; providing advice and information on the development and delivery of promising practice in the sector; providing support with policy and practice matters, and regional and national data analysis reports to support local needs assessments, strategy and commissioning developments.

We also deliver direct services including the Welsh Government funded Live Fear Free Helpline; a National Training Service; the national Children Matter programme of work which, for example, supports local services to help children and young people affected by abuse and to deliver preventative Safety, Trust and Respect (STAR) programmes across Wales, and refuge and advocacy services in Colwyn Bay and Wrexham. We are piloting the Survivors Empowering and Educating Services (SEEdS) project, which is empowering survivors of violence and abuse to collectively influence and inform services and commissioning frameworks, and help change public and community attitudes. We also deliver the Wales National Quality Service Standards, a national accreditation framework for domestic abuse specialist services in Wales (supported by the Welsh Government) as part of a UK suite of integrated accreditation systems and frameworks. (More information on the NQSS can be found here: <http://www.welshwomensaid.org.uk/what-we-do/our-members/standards/>)

**Consultation Response:**

Welsh Women's Aid responded to the UK Government consultation on the funding of supported accommodation in February 2017 and has been involved in the short term accommodation working group that put forward proposals to the UK Government on funding mechanisms. We are also working with the Welsh Government in developing a devolved model for funding supported housing.

Welsh Women's Aid welcomes that within the White Paper the UK Government has taken on some of the recommendations made within the previous consultation period, namely:

- Extending the time period for Welsh Government to develop a Wales model, so implementation of the new funding mechanisms will not happen until April 2020;
- Recognising the need to have a differing model for short term accommodation;
- Removing the plan to extend the Local Housing Allowance (LHA) to social housing, including supported accommodation;
- Recognising that the Universal Credit process was not an appropriate mechanism to fund short term accommodation housing costs;
- Allowing for the funding to cover all housing costs including rent and eligible services charges.
- Devolving of the funding pot to Welsh Government to create a model that can align with other devolved funding streams for the sector in Wales.

This said, there are still concerns being raised by our membership regarding the recognition of the unique purpose of refuge, the sizing of the funding pot and its inflexibility to meet need, how the



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funding will be distributed and the possible knock on effects on the national network of refuges from the proposed model in England.

Our response is restricted to the relevant parts of Section 3 of the consultation for our members as providers of refuge services in Wales and our role within the national network of refuges in the UK. In light of this we have not used the set out consultation questions, instead, focusing on the 6 key points raised by our membership.

## 1. Definition

The definition proposed is a broad definition encompassing a wide range of short term accommodation. It does not reflect the distinct nature and role of refuge as specialist, gender responsive provision. Recognising the unique purpose of refuge within the definition is highly important if moving towards the commissioning model outlined. Our members have fed back that there is lack of understanding by commissioners of the specialism of refuge services and this has a detrimental impact on commissioning decisions made at local and regional levels. This has had knock on impacts in the level of provision across the national network of refuges.

For this reason, there is a need to reflect refuge provision as defined by Routes to Support<sup>2</sup> (previously 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.'* (Routes to Support, 2017)

## 2. Removal of individual benefit entitlement

Welsh Women's Aid welcomes the removal of the funding for short term accommodation from the Universal Credit process, recognising that the process was not an appropriate mechanism to fund short term accommodation housing costs. Even with the changes to the Universal Credit process set out in the Chancellor's Budget speech in November 2017, the need for this element of funding to come directly to the provider due to the short term nature of the provision remains.

The removal of the funding of refuge via housing benefit, however, represents a significant shift in the funding of refuge provision in the UK that is not recognised within the White Paper. This proposed change will represent a fundamental change to how refuge has been funded. This will have significant impacts on the refuge providers and, therefore, the survivors that access the services.

<sup>2</sup> Routes to Support is a web based information system providing up to date information on domestic violence/abuse services. It aims to assist women and children facing domestic violence/abuse to find the right help by enabling front-line services to notify the refuge spaces or other services they have available: <https://routestosupport.org>



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The current system of funding through individual benefit entitlement to housing benefit has offered some funding security to refuge services and ensured that all those eligible for housing benefit are entitled to their housing costs being covered in refuge. There are concerns that this significant change is happening due to reactionary consequences of the implementation of Universal Credit rather than a consideration of the sustainability of a national network to meet the needs of all survivors and their children as a starting point for a new funding mechanism that has refuge provision as its focus.

The current system has allowed for the accommodation cost of refuge for each survivor to be guaranteed to be met if they were eligible for welfare benefits. It has also enabled the pot to be flexible to fluctuations in levels of demand where as other funds have been reduced below levels of demand. Specialist services, in the last year alone, have suffered the loss of 30% of funding from Housing and Homeless prevention grants from local authorities in Wales.<sup>3</sup> Housing benefit covering housing costs has provided critical stability for refuges in the continued challenging funding landscape of competitive commissioning and reductions in other funding streams. The removal of the link to individual benefit entitlements to commissioning through competitive tenders and grants means that this consistency and flexibility in funding need will be lost.

Welsh Women's Aid welcomes any extension of funding to cover women with no housing benefit entitlement being able to access refuge (e.g. EU nationals, students, women in employment) as this is in line with the UK Government's commitment to ensure that "no victim is turned away from accessing critical support services delivered by refuges." It is also critical to recognise that this could represent an unknown increase in demand to a pot that has been fixed prior to opening up access to services. At present, our members have reported that it is not possible to estimate the possible increase this may have on demand. As the pot is to be determined using the current demand levels it is also of concern that the proposals do not outline how any increase in demand may be addressed. Last year 500 survivors in Wales were unable to be supported in refuge because of a lack of service resources or capacity.<sup>4</sup> The turn-away rate highlights that resourcing of specialist services is already not insufficient to meet demand. Any increase in demand without a corresponding match to resources would lead to further survivors not being able to access the life-saving and life-changing provision they need.

The policy statement should also recognise that the removal of funding from individual entitlement to benefits also allows reexamination of the issue of 'no recourse to public funds'. Last year in Wales 78 survivors were referred to refuge-based support in Wales who, because of their insecure immigration status, had 'no recourse to public funds' so their places was unable to be funded.<sup>5</sup> Within the current proposals there will still be an issue with 'no recourse to public funds' as it will still be based on an individual's entitlement to benefits. This undermines the commitment that no-one is turned away. In removing the individual entitlement to benefits the UK Government should

<sup>3</sup> Welsh Women's Aid, State of the Sector Report 2017, published December 2017  
<http://www.welshwomensaid.org.uk/wp-content/uploads/2017/12/WWA-State-of-the-Sector-2017-ENG.pdf>

<sup>4</sup> Welsh Women's Aid, State of the Sector Report 2017, published December 2017  
<http://www.welshwomensaid.org.uk/wp-content/uploads/2017/12/WWA-State-of-the-Sector-2017-ENG.pdf>

<sup>5</sup> Welsh Women's Aid, 'Summary of 2016/17 Data from Specialist Services in Wales', 2017.



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ensure that this allows for all survivors to access refuge, and the funding pot must reflect the demand that this will entail.

**3. Sizing of the pot for Wales and future demand**

Welsh Women’s Aid members have raised concerns about the level of funding being fixed at a 2020/21 equivalent to that which would otherwise have been available through the welfare system. 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. It is likely that any increase in costs or reduction in the pot will lead to a reduction in support elements at a time when we are seeing increased support needs of women and children accessing refuge (for example, increasing identification of complex needs and multiple disadvantage).

Further to this, the funding devolved to the Welsh Government must include the administration costs, if there is to be no reduction in the amount of funding going to direct service provision. 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 monies will be needed to support the administration of the fund.

**4. Ring fencing of the fund being provided to Welsh Government**

The funding should be ring-fenced to provide long term stability. Refuges in Wales are facing further risks to their funding as significant Welsh Government grants are devolved to local areas, losing their ring fencing. This means that the current housing benefit element of funding will be particularly important to refuges in Wales, providing an element of stability when other funding pots are becoming increasingly less stable. There are concerns that the allocation of the funding for supported housing from the previous housing benefit pot in Wales will also go into a local non ring-fenced pot. If this is the case, refuges in Wales could have the potential to lose all their funding, not just the support element, leading to significant risks to the future of refuge provision in Wales, and impacting on the network of provision across the UK. It is critical that this element of funding is secured through ring fencing for its current purpose, before being allocated to the Welsh Government, to ensure that the purpose of the funding is protected.

**5. Impact on national network of provision**

Due to the nature of domestic abuse and the requirement to often arrange refuge support at a safe location away from the survivor’s home, Welsh Women’s Aid have significant concerns regarding the potential knock-on effects from the impact of the new model of funding in England for the national network of refuge provision in the UK. The proposed model in England to localise the funding of refuges further is likely to have detrimental impacts on the English part on the national UK network of refuge. This will increase demand on services in Wales and limit survivor ability to access refuge provision throughout the UK.

The UK Government has stated it will encourage local authorities to work together closely so that no-one is turned away and they will have to detail provision for groups with no local connection. However, there appears to be no incentive for local authorities to do this. A local commissioning model could detrimentally impact on refuges that cannot work on any local connection basis, often for very tangible reasons of safety for the survivor and any children. There are also concerns about

those refuges that are not currently funded at a local level, particularly specialist BME provision, being recognised within local needs assessments and funding mechanisms. Worryingly, we are already seeing commissioners discussing local quotas for accessing refuge, this fails to understand the needs of survivors and their children to access refuge where and when they need it regardless of location.

Further to this, there are significant concerns that the England model, with refuge provision being included within the same pot as other generic provision, risks incentivising generic, 'one-size-fits-all' provision for short term housing services. As outlined above, this fails to recognise the importance of specialist refuge provision to deliver high quality support to survivors and their children and achieve long term positive outcomes.

A framework needs to be in place as part of the model to enable cross-boundary working. Local connection criteria is not appropriate for refuge services. The national network of refuge and move-on provision across the UK is a critical resource for the many survivors that need to travel beyond their local area to escape their abusive partner to ensure the safety of themselves and their children. Any funding model in England needs to acknowledge the potential impact on the network provision across the UK, and the survivors that will access it from elsewhere. It must guarantee that it supports services to operate collectively within a national UK network, both in Wales and across the UK.

Both the UK and the Welsh governments 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.

## 6. Timeframe

Welsh Women's Aid welcomes the extension to the timing for the roll-out of these proposals. This fundamental change needs to be developed within a realistic timescale and should not be confined by the plans for the roll out of Universal Credit. Similarly, such a significant change should be piloted and tested to ensure that it works effectively, this could include a staggered implementation across areas to allow for any issues to be addressed before it impacts provision across all areas.

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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:  
**Gwendolyn Sterk, Public Affairs Manager**



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