

Domestic Abuse and Violence Bill

Consultation response from the National Housing and Domestic Abuse Policy & Practice Group

May 2018



NATIONAL
HOUSING
FEDERATION



Domestic Abuse Housing Alliance



Shelter



women's aid
until women & children are safe



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against domestic violence



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Overview of our recommendations

As part of our response to this consultation, we have developed this summary report to provide an overview of the key issues and barriers that in our experience require greater attention for the Government to meet their stated ambition to transform the response to domestic abuse. We have brought together the extensive knowledge and experience from each of our individual organisations across the housing and domestic abuse landscape to offer recommendations and to raise awareness of what policy and practice changes need to be made to enable individuals experiencing domestic abuse to be supported appropriately.

In addition to our group response to the questions set out, our summary therefore includes the following recommendations:

1. A 'whole housing' approach to domestic abuse:
 - To ensure there is a full suite of housing options for survivors of domestic abuse and one which enables agencies and organisations to work together more collaboratively. Effective prioritisation and coordination of this approach will ensure that they look at the long-term security of the survivor, as well as managing short term crisis situations.
 - The 'whole housing approach' needs to be supported by more supply of genuinely affordable accommodation.
 - Provision of sufficient secure move on accommodation: Consider how the whole housing approach will encourage agencies to work in tandem with each other to look at the long-term security of the survivor, as well as managing short term crisis situations
2. Homelessness Strategies, and Supported Housing strategies must align with and be developed alongside Violence Against Women and Girls (VAWG) strategies (or Domestic Violence and Abuse strategies) on both a local and national basis.
3. Ensure priority need legislation protects survivors of domestic abuse: by ensuring individuals fleeing domestic abuse are automatically assumed to be priority need and removing the postcode lottery around survivors being assessed as 'vulnerable'
4. A Domestic Violence and Abuse expert should be located within housing options teams and ongoing and robust training, in collaboration with specialist domestic abuse organisations, to be delivered on an ongoing basis.
5. The Women' Aid and Nia Femicide research has shown, 75% of women killed by current or ex-partners in 2016, were killed in their own homes. DHRs should place further emphasis on housing/homelessness: more robust analysis of housing situations of victims and perpetrators of domestic homicides in individual DHRs and overview reports must identify patterns and trends in housing.
6. Provide equal access to housing options and refuge to women with no recourse to public funds (NRPF).
7. Welfare reforms policies must not create additional barriers to women leaving an abusive relationship, particularly as some of these measures increase the scope for economic abuse: the benefit cap, Universal Credit and repayments of benefit advances need urgent attention.

In addition, we feel that there are gaps in the Domestic Abuse Bill consultation around addressing some practical and low cost changes to legislation, policy and practice in relations to housing and housing related provision. In our view these changes and this focus is fundamental in the safe exit and successful rebuilding of lives for children, families and individuals that are affected by domestic abuse. Furthermore, this will all require a strong overview from the Domestic Violence Commissioner.

Our detailed recommendations, views and responses are highlighted in the following sections of this report.

There needs to be a ‘whole housing’ approach to domestic abuse to ensure there is a full suite of housing options.

The whole housing approach recognises the range of advice and options in any area which are required to safely address domestic abuse. These are outlined in the diagram below:



- 1. Refuges** – these lifesaving services are at the centre of this approach as they underpin the crisis response to domestic abuse. Refuges operate as a national network enabling women and children to move across local authority boundaries in order to be safe, they offer critical protection to around 13,000 women and 14,000 children every year. Specialist refuges, run ‘by and for’ women offer safe accommodation and a planned programme of therapeutic support to help families to begin to cope and recover from their experiences. They also offer expert support around housing, immigration, benefits, children, welfare, justice and employment. These services add significant value to local communities often providing strategic advice to local authorities and other statutory bodies, running additional services with no dedicated funding, running training and working on awareness raising in the local community. Refuges have faced huge challenges over the last few years with poor commissioning practices and local funding cuts leading to the dismantling of the national network of services. The Government’s proposed changes to funding for ‘short term’ supported housing, which includes refuges, from 2020 further threatens to destabilise the sector when their last form of secure incomes – housing benefit – is removed. We support Women’s Aid’s calls for a sustainable funding model for refuges which will allow these services to survive and thrive.

- 2. Private rented sector** - The Private Rented Sector (PRS) needs to be better informed and aware of what constitutes DA to improve its response and adhere to safeguarding responsibilities. This deeper understanding could be achieved through better engagement with the Landlord Professional bodies (National Land Association (NLA), (Residential Landlords Association (RLA), [ARLA](#)) and for them to provide training on DA to their members. Good practice guidance should be developed, disseminated and made readily available to all landlords.
- 3. Privately owned properties** - Banks, mortgage providers and estate agents also need to have a better understanding of DA. This includes how the purchase, sale and re-mortgaging of properties may be linked to economic abuse. Similarly, the home of the non-abusing parent may be at risk of repossession if the abuser stops paying the mortgage or refuses to sign paperwork related to it. This understanding needs to be reflected in the work of UK Finance as well as professional bodies for surveyors and legal professionals. As well as supporting women's economic stability, work in this area would relieve pressure on social housing.
- 4. Managed Reciprocals** -A Pan- London reciprocal is co-ordinated by Safer London. [The Pan London Reciprocal](#) is a voluntary collaboration between local authorities and registered housing providers in London to move people from one social housing tenancy to another. Its purpose is to prevent homelessness for women fleeing domestic abuse and this simple and effective response should be coordinated regionally and nationally.
- 5. Sanctuary schemes** – Enable security improvements to be made to a survivor's home so that the survivor is more able to stay in her home safely. . The local authority usually manages access to these schemes and in some cases housing associations also put sanctuary schemes in place. Some areas do not have sanctuary schemes. We recommend an evaluation of these schemes is needed, specifically to address the availability of the schemes, how they are funded and to highlight how they are preventing further abuse and making survivors feel safe and protected.
- 6. Housing First/ mobile advocacy / flexible funding / secure move-on- These recent innovations** provide an important routes to support for some of the most marginalised and vulnerable survivors, such as those who are rough sleeping and women with multiple needs. A best practice example would include the work of [STADV](#) in the tri-borough.
- 7. Outreach/ floating support & IDVAs** -For women in the community and those who remain in their own homes. These services are usually delivered by local specialist domestic abuse services, such as those run by Women's Aid member services across England.
- 8. Perpetrator Management** – The whole range of whole housing approaches require addressing and supporting perpetrators to change. This includes addressing abusive behaviour via enforcement activity which is underused and support to address abusive behaviour.
- 9. Supported housing / Sheltered Schemes** – This includes supported housing provided by local authorities and housing providers for older people, people with learning disabilities, hostels, young people and people with substance misuse issues as well as hostels. We know that a large proportion of women living in hostels report having experienced domestic abuse ([St Mungo's \(2014\)](#), reported that nearly 50% of their female clients had experienced domestic abuse and 19% had experienced childhood abuse. Domestic abuse contributed to the homelessness of a third of women in their study) and it is vital these services are able to offer dedicated support around domestic abuse and there is clear pathway to specialist support.

- 10. Resident Support Schemes** – This scheme replaced Community Care Grants and is the only government funding available for survivors of domestic abuse who have had to flee abuse or leave a refuge and furnish their new homes.
- 11. Local Authorities /Housing Options** - Housing options advice and action is often a critical first step for those who are homeless due to domestic abuse. Practice improvements required include raising awareness, improving practice and processes within the housing options / homelessness and temporary accommodation departments to ensure families are supported effectively. This has been aided by having co-located support workers/ IDVA's in these departments
- 12. DAHA accreditation**- All housing providers (LA/ housing associations) should be encouraged to seek [DAHA](#) Accreditation as it is the UK benchmark for how housing providers should respond to domestic abuse in the UK. It is underpinned by 8 priority areas and includes an online toolkit and workshops which help housing providers to achieve the DAHA standards of practice and accreditation.
- 13.**

Homelessness Strategies and Supported Housing strategies linking to VAWG strategies (or Domestic Violence and Abuse strategies).

- The whole housing approach can only work effectively if both national and local housing and homelessness strategies are aligned with VAWG and DA strategies. On a national level the Government's refreshed VAWG strategy must read-across to the Government's work on supported housing, rough sleeping and homelessness. This will reduce siloed working in these areas, encourage collaboration and ensure there are not unintended consequences of various housing policies on survivors of domestic abuse.
- There should be guidance on how to do this and best practice examples. In the tri-borough there is a Housing Operational Group which brings together best practice from both the LA and housing providers to discuss what this looks like and actively work together to improve the whole housing approach as the local level.
- The government has announced the creation of a new Domestic Abuse Commissioner role which will 'stand up' for victims and survivors of domestic abuse. The role must go further and, crucially, must underpin a clear framework of national accountability for the resourcing, quality and provision of services. That is why the role should sit under the VAWG Strategy. This would not only recognise that different forms of violence and abuse women face are interlinked and a cause and consequence of women's inequality, but recognise that the best local area VAWG services are planned and delivered in an integrated way.
- Giving the DA Commissioner statutory powers to monitor statutory agencies and local authorities, to ensure that these organisations are accountable to the National Statement of Expectations; providing appropriate and safe services which are accredited to nationally recognised standards, as well as compelling them to engage in the Commissioner's work will provide a clear, consistent and effective approach.

Ensure priority need legislation protects survivors of domestic abuse

- Victims of domestic violence and abuse should be classified in the law as a stand-alone priority need for housing rather than the current system which requires vulnerability criteria to be met. Many of the organisations involved in this paper are already making this recommendation. The All-Party Parliamentary Group for ending homelessness report¹ which provides recommendations on the extension of priority need following concerns that local authorities who have limited resources are using the vulnerability test as a gatekeeping tool. They stated *"We argue all persons who experience domestic violence are, by definition, vulnerable and therefore they should be placed in the automatic priority need category. We believe this change to the English legislation could change the culture around how survivors are treated by Housing Options teams and would speed up their recovery. It is crucial a survivor is in safe accommodation as soon as possible and this change would allow the survivor to feel supported and significantly reduce the risk that they would return to their previous home or sleep rough"*

The Homeless Reduction Act came in in April 2018 and some LA's have already implemented this however, this is a case in point for the fact that for the HRA to succeed there needs to be a whole housing approach locally.

- We recommend that a Domestic Violence and Abuse expert be located within local housing teams.
- A consistent response across Housing Options teams is crucial to remove any post code lottery in how domestic abuse cases are handled and the support offered to victims.
- In 2014 Crisis produced a report² of their findings from when they used 'mystery shoppers,' presenting themselves as homeless at 16 different Housing Options and homelessness services across 16 local authorities across England in order to examine the quality of advice and assistance provided to single homeless people (i.e. those without children of a dependant age). The report states 'Of the 87 visits carried out, only 37 were given appropriate advice and support and would have been accommodated that evening. At 20 of these visits mystery

¹ https://www.crisis.org.uk/media/237534/appg_for_ending_homelessness_report_2017_pdf.pdf

² https://www.crisis.org.uk/media/20497/turned_away_es2014.pdf

shoppers were deemed in priority need, although it should be noted that mystery shoppers who were deemed to be in priority need by some local authorities were not when they visited others, demonstrating inconsistency of approach across the country’.

- In 2017 Women’s Aid launched a report³ as part of their No Woman Turned Away Project, which is funded by MHCLG. The report highlighted issue with the response of local housing teams to vulnerable women and children fleeing domestic abuse. Their research showed local housing teams prevented 78 (19%) survivors supported by the project from making a valid homeless application. The 78 women were given a range of justifications from local housing teams as to why they were not eligible: 14 women were told to call the helpline, 8 were told to return to perpetrator, 12 were refused as they had no local connection.
- This current situation creates additional barrier for women who are ready to move on from refuge and leaves those that do with the struggle of re-establishing their and their children’s lives after an often prolonged and uncertain re-housing process, which has been impacted negatively by a shrinking number of affordable homes.

DHRs should explore further into housing/homelessness

- **Although DHRs do cover domestic abuse (i.e. statutory guidance), more awareness of findings of DHRs related to housing is needed.**

All elements of the whole housing approach should be covered within the DHR statutory guidance so that all DHRs cover housing issues as a matter of course and local, regional and national trends and patterns can be identified and drawn out.

- **More awareness of Local authorities and DHR chair as to how they address better housing within a review.**

Improvements in the DHR findings in relation to housing would be a useful learning and advocacy tool for landlords, banks and the range of other stakeholders in the whole housing approach. Training to accredit chairs should be reintroduced and should include the whole housing approach. DHR outcomes should include a robust action plan where agencies are held accountable to complete specific actions. These should be monitored by the Community Safety Partnership. The overarching view could be the role of the new DA commissioner, depending on the level of power they hold.

- **All DHRs should include tenure of victim and perpetrator as a matter of course.**

There should be an annual comprehensive analysis of DHR findings overall which includes aspects relating to housing. There should be a central database of all published DHRs so that those that include housing-related learning are easily accessible to housing professionals. This would help to develop best practice and service excellence across the sector. A best practice example of this was a DHR undertaken in East Sussex where an event was held in response to the findings that were related to housing in terms of the reports being treated and responded to as ASB rather than domestic abuse. DAHA were able to encourage housing providers that attended to undertake accreditation to improve their response.

Equal access to housing options and refuge for women with no recourse to public funds (NRPF).

- The ‘No Recourse to Public Funds’ (NRPF) rule prevents people subject to immigration control from accessing certain public funds. We are deeply concerned that this means that migrant women with insecure immigration status cannot access safe and secure accommodation, even in refuge. While some women who have NRPF can access public funding from social services if they have children, during 2016/17 only 766 out of 11,187 vacancies (5.4%) posted on Routes to Support⁴ were able to consider applications from women with NRPF⁵ due to the funding pressures these services face and their lack of access to statutory financial support.

³ <https://1q7dqy2unor827bqjls0c4rn-wpengine.netdna-ssl.com/wp-content/uploads/2017/07/NWTA-Full-report.pdf>

⁴ “Routes to Support”, the UK violence against women and girls service directory is the new name for UKrefugesonline (UKROL), the UK-wide online database which contains information about domestic abuse and other violence against women services which available for women and children throughout the UK along with up to date refuge vacancies

⁵ <https://www.womensaid.org.uk/survival-beyond-report/>

- The Destitute Domestic Violence Concession (DDVC) provides women on spousal visas who can prove they have left their marriage due to domestic abuse with access to some welfare benefits for up to three months so they can access a refuge. However, this provision is limited to women on spousal visas who have limited leave to remain during their first two years in the UK. Women who are from the European Economic Area or who are on other types of visas, such as Student Visas or Work Visa, are not eligible. Three months is not a sufficient length of time for UK Visas and Immigration to consider their application or for refuges to feel confident the woman will be funded for the entire length of her stay in a refuge.
- In 2016/17 No Accommodation Network (NACCOM)'s members provided accommodation to approximately 1,900 people including a large proportion of destitute refused asylum seekers and others who couldn't access mainstream housing or support. They had to turn away at least 1,000 people, and this is likely to be a significant underestimate as not all services record this information⁶.
- We know that consequently these women are then faced with an impossible choice of either remaining in a violent situation that may be life-threatening or becoming destitute. Increasingly we are also growing concerned that women with insecure immigration status who report domestic abuse to the police are being questioned on their legal status and those who may unintentionally be an 'over stayer' or in breach of the conditions of their visa may be threatened with deportation or sent to detention centres.
- In addition, BME women and women with NRPF are often under-represented in service use and provision. 'By and for' services for BME women have been disproportionately impacted by the changes to funding and commissioning over the last few years. Specialist BME services are vital as they provide dedicated spaces for BME women and have expertise about the specific forms of violence, such as Female Genital Mutilation (FGM) which have a disproportionate impact on BME women and girls, as well as the structures which shape women's experience of abuse such as discrimination, racism, and gender dynamics within family and community structures⁷. A survey of women using specialist BME domestic abuse services found that 89% of women (126 women) said they preferred to use abuse services with a BMER specialism. They particularly valued being with other BME women who had experienced abuse, being able to communicate in their own language and the specialist expertise of staff.

Secure Move on accommodation

- A key aim of the [whole housing approach](#) is to encourage agencies and organisations to work in tandem with each other ensuring that they look at the long term security of the survivor as well as short term crisis management.

In too many domestic abuse cases agencies feel their only role is to move a survivor into some form of accommodation without considering the long-term picture. One survivor could be passed through multiple types of accommodation over a short period of time before being able to acquire a more secure tenure. There is little consideration of the psychological, physical and economic impact this can have on them and their families.

Welfare reforms need reviewing to stop them being a barrier to secure move on accommodation

- **Remove the benefit cap for survivors for 2 years when moving out of refuges and remove the requirement to repay benefit advance** The Housing Benefit Cap can significantly restrict the options available for survivors moving out of temporary or refuge accommodation. In a report⁸ by Shelter in 2017 they identified that: *'Government changes to LHA, particularly the four-year freeze on LHA rates, has caused benefit rates to become increasingly misaligned with local rent. Research by Shelter shows that by 2019/20, four fifths (83%) of England will be unaffordable to LHA claimants'*.
- **Ensure that survivors of domestic abuse can access short-term advances to help pay for rent deposits and furnishing their new home**

⁶ <https://naccom.org.uk/submission-appg-ending-homelessness-recommendations-change/>

⁷ <https://1q7dqy2unor827bgjls0c4rn-wpengine.netdna-ssl.com/wp-content/uploads/2017/07/NWTA-Full-report.pdf>

⁸ https://england.shelter.org.uk/_data/assets/pdf_file/0004/1391701/2017_06_-_Shut_out_the_barriers_low_income_households_face_in_pivate_renting.pdf

The Welfare Reform Act 2012 saw the removal of Crisis loans which were replaced by short-term advance payments.

Community Care Grants were also abolished at this time in name but government argues that such grants can still be given via each Local Authority's Revenue Support Grant which has an amount identified for welfare provision. The lack of ring-fencing for this provision and the criteria for the short-term payments being quite restrictive could result in survivors of domestic abuse being refused access to them. To fully ensure that a survivor can obtain secure accommodation and create a new home for themselves (and for children where applicable) we need to ensure that we can provide them with the right tools to do so. Starting from scratch can be impossible, leading to them being financially unstable, narrowing their options and increasing the risk of them returning to the perpetrator or getting into serious debt with pay day loans⁹.

- **Do not freeze benefits whilst claims are being investigated – particularly in domestic abuse cases**

Universal Credit has created some serious risks for those fleeing domestic abuse, in particular such concepts as joint claims as discussed in a recent report¹⁰ from Women's Aid. But with regards to secure move on accommodation one of the main concerns is benefits being frozen whilst fraud claims are investigated.

Anecdotally we know perpetrators are making malicious allegations of benefit fraud which will freeze their victims access to money and has serious knock on impacts and implications.

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- **Rethink current benefits sanctions and a DVA specialist in job centres**

National charity Gingerbread who work with single parent families produced a paper¹¹ in April 2018 demonstrating how current welfare reforms and sanctions have a significant negative impact on single parent families and can be a detriment in helping them back to work. We know that single women experiencing domestic abuse are particularly affected by this. Their key findings were:

- Warnings and sanctions for single parents arise as a result of unrealistic and rigid job-seeking requirements under benefit rules, which fail to recognise single parents' barriers to work (e.g. a lack of childcare or flexible work)
- The promise of personalised support with new claimant commitments and Universal Credit has failed to materialise
- Single parents end up with debts and have to rely on foodbanks and other emergency support when sanctioned – even if these are later overturned
- Single parents are left unable to afford to travel to the jobcentre or interviews after a sanction – leaving them further from work
- Sanctions (and warnings) cause considerable distress for parents worried about having the means to look after and care for their children while sanctioned.

⁹ <http://www.cpag.org.uk/content/what-replacing-social-fund>

¹⁰ https://1q7dqy2unor827bqjls0c4rn-wpengine.netdna-ssl.com/wp-content/uploads/2015/11/Women_s_Aid_TUC_Financial_Abuse_Report_March_2015.pdf

¹¹ <https://www.gingerbread.org.uk/policy-campaigns/publications-index/unhelpful-unfair-impact-single-parent-sanctions/>

Appendix 1

Group Questions Responses

Q9. What further support can we provide to the public (employers, friends, family, community figures) so they can identify abuse and refer victims to help effectively.

Housing Providers and financial institutions are in a unique position to identify and respond to domestic abuse in their communities. Furthermore, through publicity and campaigns can raise awareness of the issue to ensure communities show zero tolerance to perpetrators of domestic abuse and support and help those that need it. The DAHA accreditation looks at how housing providers can do this and provides best practice examples. At Peabody and Gentoo, two of the founding partners, this approach has had a significant impact on reporting rates and understanding of domestic abuse.

Q35. What practical barriers do domestic abuse victims face in escaping or recovering from economic abuse and how could these be overcome?

Economic abuse is likely to leave people with a damaged credit rating, as well as a burden of debt repayments, potentially resulting in homelessness. Some victims may be completely without an income. A situation that will be exacerbated by the decision to impose a single monthly payment as part of the design of Universal Credit. Our recommendations are aimed firstly at reducing the impact of the abuse, and secondly at supporting the victim's recovery.

In cases of economic abuse, courts should be empowered to transfer liability for related debts to the perpetrator, following the award of a DAPO. Where this is not possible, banks and other financial service providers (including 'pay-day loan' providers) should be required to write off debts. The costs of the requirement could be covered by an insurance scheme, with individual providers' premiums reflecting their arrangements to identify and prevent financial and economic abuse). A similar requirement for other bodies with which victims may have debts – like utilities companies or Housing Associations – could be funded from miscellaneous government funds, such as dormant bank accounts, or unclaimed estates. We'd also like to see the value limit for debt relief orders increased in cases where a DAPO has been granted. At a minimum, debt that has arisen through financial and economic abuse should be frozen, and isolated, such that it doesn't affect victims' credit worthiness.

Limiting the impact of economic abuse is a complex challenge, and victims are likely to need both advice and guidance; and in some cases, specialist support. The same need may apply to recovery from economic abuse. Victims are likely to need funds to establish a new independent household. Or training and support to rebuild confidence and enter the workplace, or gain qualifications. The approach should recognise the specific challenges for individuals, with specialist support complemented with supported access to non-specialist services, such as further education colleges.

HB Cap should not be capped for 2 years when moving out of refuges and no repayment of benefit advance – Sian at WA to provide response from members

The Housing Benefit Cap can restrict options available for survivors moving out of temporary or refuge accommodation. A report by Shelter in 2017 identified that: *'Government changes to LHA [have] caused benefit rates to become increasingly misaligned with local rent. Research by Shelter shows that by 2019/20, four fifths (83%) of England will be unaffordable to LHA claimants'*.

Ensure that survivors of domestic abuse can access short-term advances to help pay for rent deposits and to furnish their new home

The Welfare Reform Act 2012 saw the removal of Crisis loans which were replaced by short-term advance payments. Criteria for the payments are restrictive and can result in survivors of domestic abuse being denied aid. So a survivor can

obtain secure accommodation and create a new home for themselves, we need to ensure we can provide them with the right tools to do so.

Do not freeze benefits whilst claims are being investigated – particularly in domestic abuse cases

Universal Credit (UC) has created serious risks for those fleeing domestic abuse. With regards to secure move-on accommodation, the biggest concern is benefits being frozen while claims are investigated. A perpetrator can make malicious allegations against their victim to the Department of Work and Pensions (DWP), knowing the victim's benefits could be frozen.

Rethink current benefits sanctions and a DVA specialist in job centres

National charity Gingerbread produced a paper in April 2018 demonstrating how current welfare reforms and sanctions have a negative impact on single parent families and can be detrimental to helping them back to work. Key findings were:

- Warnings and sanctions for single parents arise due to unrealistic and rigid job-seeking requirements under benefit rules, which fail to recognise single parents' barriers to work
- The promised personalised support for new claimants of UC hasn't materialised.
- Single parents who accrue debts must rely on foodbanks and other emergency support when sanctioned – even if the sanctions are later overturned
- Sanctions leave single parents unable to afford to travel to the jobcentre or interviews
- Sanctions (and warnings) cause considerable distress for parents

Q38. Do you think creating a legislative assumption that all domestic abuse victims are to be treated as eligible for assistance on the grounds of fear and distress (if the victim wants such assistance), will support more victims to give evidence?

YES

Q62. One proposal is that the Domestic Abuse Commissioner could routinely collate, quality assure and share lessons learnt from DHRs. What could be done to increase awareness of the learning from DHRs?

There should be an annual comprehensive analysis of DHR findings overall which includes aspects relating to housing. There should be a central database of all DHRs so that those which include housing related learning are easily accessible to housing professionals. This can help to develop best practice and service excellence across the sector.

Q63. How can areas best hold their own legal agencies to account in terms of monitoring delivery against DHR plans?

DHR outcomes should include a robust action plan where agencies are held accountable to complete specific actions. These should be monitored by the Community Safety Partnership. This method is currently used by Community MARACs when holding agencies to account in cases of ASB Community Triggers and has been quite effective.

There should be more accountability for agencies involved with a DHR – this could be part of the DA Commissioner role which could include ramifications for agencies that don't make changes. For example in Wales, the Housing Minister only provided funding for HPs who had a DA policy. The commissioner should hold similar power here.

DHRs should be able to track and identify agencies that continue to be cited. The Commissioner needs to be able to hold whole sectors to account.