

# POLICY AND PRACTICE



# BRIEFING

Reflections and Recommendations from the  
**WOMEN AGAINST HOMELESSNESS AND ABUSE**  
(WAHA) initiative

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# CONTENTS

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## **1** P. 4

The context of public policy regarding Domestic Violence and housing in the UK

## **2** P. 5-7

Key Research Findings:

Summary of key challenges

Reflections on Impact and Challenges

5 years on

## **3** P. 8-20

Preventing Homelessness: Policy And Practice Recommendations

National level authorities

Local level authorities

## **4** P. 21

References



## KEY RESULTS |

# WAHA INITIATIVE BETWEEN 2022 AND 2023:

90 BME

90 BME survivors with complex housing needs directly supported, significantly improved their housing outcomes.

390

survivors supported through the WAHA initiative in total.

77%

of our service users secured or retained safe and suitable accommodation following the support from the WAHA project.

5

months has been the average length of support given to each case in order to guarantee positive outcomes.

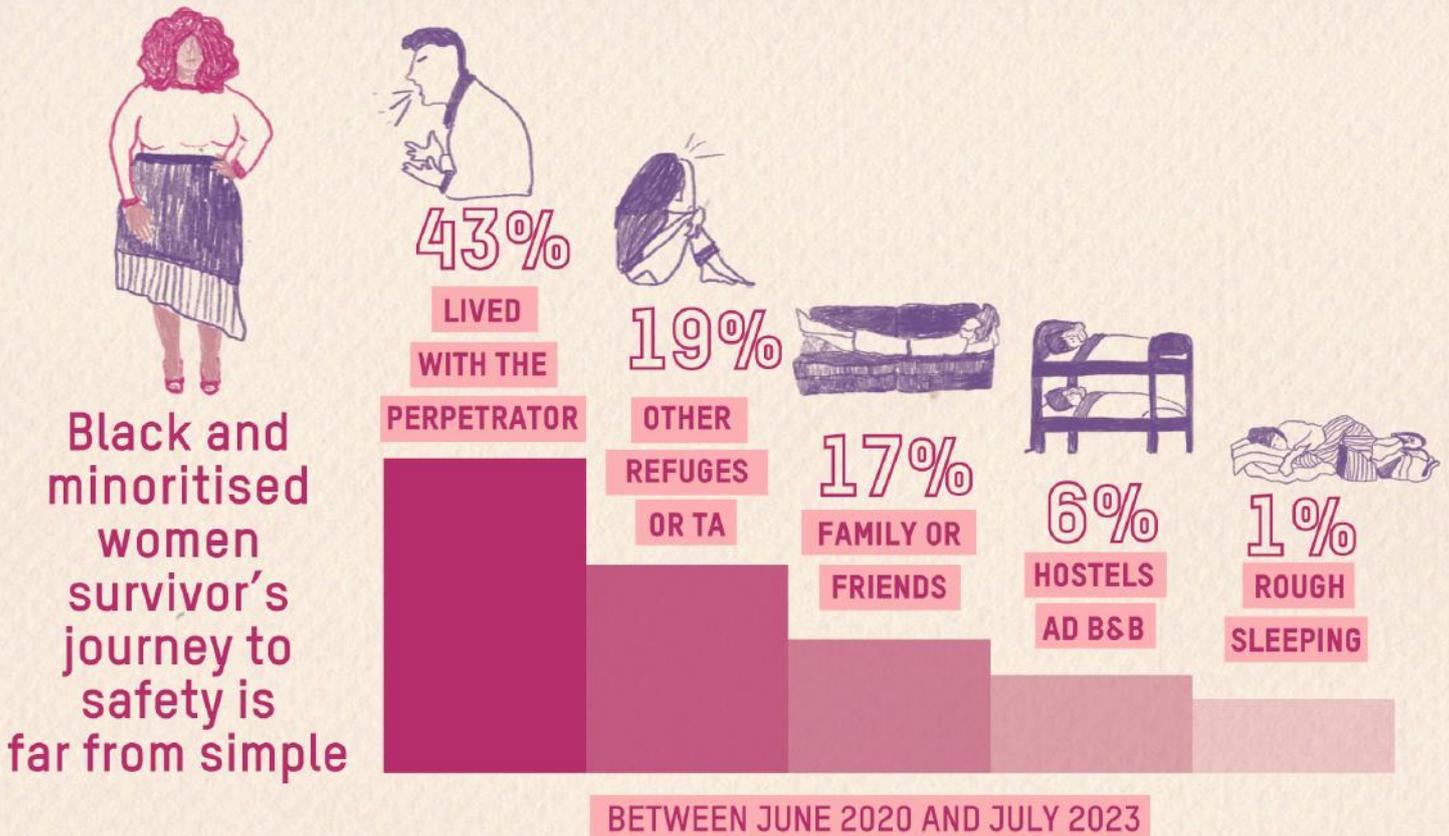
## 2

# KEY RESEARCH FINDINGS

Our research over the last five years reveals that Black and minoritised survivors are faced with complex structural barriers to accessing safe and stable forms of accommodation. They are often at high risk of homelessness and re-victimization at different stages of their journeys of fleeing violence; not only at the point of exiting a violent relationship but also for an extended period thereafter. Their journeys reveal a cycle of victimization that goes beyond the violence perpetrated by their direct abusers; their trauma is furthered by systemic and institutional failures and discrimination in the ways in which public authorities (the police and local housing authorities in particular) deal with their cases of violence.

The re-victimization experienced by Black and minoritised survivors plays out not only in terms of poor welfare/housing provisions and structural sexism but is also compounded by intersecting structures of oppression based on race, immigration status, language barrier, class and/or disability. Our direct casework experiences through the WAHA project also show a range of housing issues arising at the different stages of Black and minoritised survivors' journeys, from leaving their abusers, and moving on from refuges to issues arising even after they have been re-housed.

# BEFORE ACCESSING WAHA



## SUMMARY OF KEY CHALLENGES |

SYSTEMIC FAILURES BY LOCAL AUTHORITIES TO PROVIDE ESSENTIAL SERVICES SUCH AS INTERPRETING SERVICES, ACCESSIBLE INFORMATION & REFERRAL OPTIONS. THESE FAILURES RESULT IN INSTITUTIONAL DISCRIMINATION AND SUBSTANDARD/POOR TREATMENT OF BLACK AND MINORITISED HOMELESS SURVIVORS BY LOCAL HOUSING OFFICIALS, OFTEN INFLUENCED BY FACTORS SUCH AS RACE, IMMIGRATION STATUS, AND ENGLISH PROFICIENCY.

ENTRENCHED GATEKEEPING PRACTICES BY LOCAL HOUSING TEAMS.

CONTINUED FAILURES BY HOUSING AUTHORITIES TO SECURE SAFE, SUITABLE AND ENDURING HOUSING FOR SURVIVORS UPON THEIR TRANSITION FROM REFUGE ACCOMMODATION.

# REFLECTIONS ON IMPACT AND CHALLENGES 5 YEARS ON



Black and minoritised women continue to face severe housing inequalities.

The specialist Black and minoritised sector currently provides 296 refuge bed spaces in the UK but demand (in 2020-21) has demonstrated that **WE NEED AN ADDITIONAL 1,172 BED SPACES.**<sup>1</sup>

Unfortunately, temporary accommodation is often unsuitable and unsafe for women and children, further re-traumatising them.

This is due to a number of interlinked issues:

1



**VISA REFUSED**

Chronic shortage of suitable and affordable accommodation across all local authorities.

2

Precarity in their living conditions due to immigration status and cost of living crisis. Often, migrant women are either NRPF or wrongly classified as such. Support **SHOULD** be given to all survivors of abuse regardless of their immigration status.

After 5 years of work, structural conditions in this area have **NOT IMPROVED.**

3



Women from our communities are also more likely to have precarious jobs, be more at risk of poverty and have weaker networks to rely on.

4



Lack of effective and sensitive responses by housing officers within councils when supporting BME VAWG survivors.



**BASED ON THIS KNOWLEDGE, AND OUR ONGOING DISCUSSIONS AND EVIDENCE ANALYSIS, AS WELL AS CONNECTING WITH THE CURRENT DEMANDS FROM OTHER LIKEMINDED AGENCIES IN THE VAWG AND HOUSING SECTOR, WE PROPOSE SEVERAL SPECIFIC POLICY AND PRACTICE RECOMMENDATIONS TO PREVENT HOMELESSNESS.**

# 3

## PREVENTING HOMELESSNESS: POLICY AND PRACTICE RECOMMENDATIONS

### NATIONAL LEVEL AUTHORITIES |

#### THE DEPARTMENT FOR LEVELLING UP, HOUSING AND COMMUNITIES (DLUHC) SHOULD:



#### 1

Strengthen the homelessness prevention provisions within existing legislation by putting in place safeguarding and other mechanisms that hold effectively to account Local Authorities when they deal with cases involving black and minoritised survivors of abuse.

#### HOW AND WHY?

##### A

The homelessness code of guidance for Local Authorities should make clear reference of the **eligibility of EEA nationals (settled or pre-settled status) for homelessness assistance when they are victims of domestic abuse**. In many instances, women fleeing abuse that are temporarily unable to work because of the violence are wrongly being classified as ‘not workers’ and as such being denied their right to homelessness assistance. Survivors from black and minoritised backgrounds, are particularly overrepresented in these cases as we have extensively observed in our practice.

##### B

As we referenced in our 2019 report,<sup>2</sup> the Homelessness Reduction Act 2017 should embed diverse pathways approaches inclusive of the by and for Black and minoritised sector. This can be achieved through a stronger duty and changes in practice (such as **mandatory protocols between Local authorities and by and for VAWG agencies,**

## whether they are commissioned locally or not).

This would ensure increased direct referrals to by and for services and refuges and would bring standard practice and alignment with the Equality Act 2010, and the Istanbul Convention 4(3) 40.

### C

Tier 1 Local Domestic Abuse Partnership Boards (LPB) should be directly overseen by DHLUC National Steering Group, which should focus their work in developing a **National Oversight Mechanism (NOM)** that ‘delivers a secure system of funding for support costs, overseeing a mainly local system of funding and commissioning, but delivering national assurance that no woman is turned away’.<sup>3</sup>

This NOM should include

\* Representation and participation of the by and for Black and minoritised expert sector in its formal structure.

\*An extended remit to provide robust accountability over Local Authorities practices.

Similarly, Tier 2 Local Partnership Boards (LPBs) should have a clear and binding line of accountability with their corresponding Tier 1 authority and with DLUHC, who’s role should be ensuring consistent application of the procedures outlined in the Homelessness code and its crucial updates in line with the Domestic Abuse Act 2021.

## 2

Allocate adequate levels of ring-fenced funding to ensure that all domestic abuse services (not just those that are accommodation-based), and especially those from the by and for sector (who have been historically under resourced), can operate in effective ways. This is not only the most effective way to support these

communities, but also the pathway to generate more savings to the public purse in the long term.

### HOW AND WHY?

#### A

Investment in by and for, Black and minoritised led specialist organisations has been shown to deliver significant financial savings as well as a range of social benefits and outcomes for service users.<sup>4</sup> For example, our partners in the [OYA Consortium](#), [Ashiana Network](#) undertook a Social Return on Investment (SROI) analysis of their work in 2011 which showed that for every £1 invested in Ashiana Network, £9 of social value was generated to their service users over five years.<sup>5</sup>

#### B

Typically, social housing is more secure than private rented accommodation and has ‘social rent’, which is on average 50% of the market rate linked to local wages. This means that survivors who manage to move on to this type of housing have much security and are better able to rebuild their lives in non-retraumatising ways.<sup>6</sup> Being able to do this not only secures better physical and mental health outcomes for survivors, **it also generates savings in the public health system.** This is why **Homes England** should be provided with long-term investment budgets to create new and existing social rented homes. This is the only way to bring down the numbers in temporary accommodation and address housing inequalities in London.<sup>7</sup>

*Alongside the Women's Budget Group, we strongly support the recommendation from Shelter's commission on the future of social housing for the government to deliver 3.1 million more social homes within 20 years. This will ensure that the benefits of the housing safety net are more widely distributed, while saving the government billions of pounds in housing benefit paid to private landlords.*

*For more information about this visit: <https://england.shelter.org.uk/support-us/campaigns/a-vision-for-social-housing>*

### 3

Work alongside the **Home Office**, the **Regulator of Social Housing**, and the **Housing Ombudsman** to ensure that enforceable standards are put in place and are consistent with decent homes standards for temporary accommodation (TA) and that these will apply to all properties being used for TA regardless of who owns them; and regardless of immigration status of the residents.



#### HOW AND WHY?

##### A

We have ample evidence from our case work that indicates the conditions of temporary accommodation are often poor: they are often overcrowded, there is a lack of amenities to cook, do laundry, access the internet or to allow children to play safely, which are affecting children's health and development.

##### B

Appropriate regulations at the national level must be put in place for the private rented sector to ensure that all providers carry out necessary actions in terms of health and safety in a timely manner, with particular attention to vulnerable tenants such as survivors of domestic abuse, who are more at risk of a safety failure because of non-compliance.

*We strongly welcome and support the initiative led by Chartered Institute of Housing, RAMFEL, JCWI and 133 other organisations, who have signed a joint letter to Michael Gove and Suella Braverman arguing in favour of retaining licensing standards for asylum seeker accommodation. No one should be forced to live in the 'worst of the worst' housing. [See the letter here, and let your MP know you care about this issue.]*

# THE DEPARTMENT OF WORK AND PENSIONS (DWP) SHOULD:

## 1

**Exempt domestic abuse survivors from the benefits cap and lift the local housing allowance to at least 50 per cent of the median for the area, as well as to increase benefits in line with inflation.<sup>8</sup>**

### HOW AND WHY?

#### A

Housing benefit is an essential tool in preventing homelessness. However, while private rents have been rising consistently, the local housing allowance (LHA) rates (which determines the amount that can be claimed) have remained frozen, leaving vulnerable population with a shortage on average of £151 per month.<sup>9</sup> This situation is making it near to impossible for vulnerable women to afford suitable accommodation at move on stage if it is unsafe to stay at their homes but do not require to go to refuge.

## 2

**Work alongside DLUHC and the VAWG sector to ensure that forthcoming regulations in the supported housing sector effectively secure consistent standards of quality and provision nationally, while also ensuring that smaller providers such as by and for are not inadvertently disadvantaged.**

### HOW AND WHY?

#### A

The lack of regulatory oversight of exempt accommodation has led to an emergence of 'rogue providers' in the supported housing sector, whereby organisations are yielding higher rents from enhanced Housing Benefit, whilst providing a minimal level of care or support. A much-needed reform and regulations in this sector is therefore long overdue and very welcomed.

#### B

That said, without specific measures that protect specialist refuges, this Act could have unintended consequences which place overly burdensome regulations on our already underfunded national network of life-saving refuges, in particular by and for black and minoritised refuge providers, which are already facing structural disadvantages due to the legacy of protracted underfunding.<sup>10</sup> This is why we agree that specialist refuges must be subject to oversight mechanisms, however ones distinct from other types of exempt accommodation.

*We join calls made by the National Housing & Domestic Abuse Policy & Practice Group, led by the Domestic Abuse Housing Alliance for specialist refuges to be passported through proposed licensing schemes.*

*Passporting through the licensing scheme will protect the specialist domestic abuse sector from being adversely impacted by additional oversight, regulations, and financial burdens – to the detriment of survivor's access to support.*

## THE HOME OFFICE SHOULD:

**1**

**Adopt the necessary changes in current immigration rules so that women with no recourse to public funds (NRPF) are able to access State support when fleeing domestic abuse.**

HOW AND WHY?

**A**

The Government should extend the Domestic Violence Rule and Destitute Domestic Violence Concession to provide greater protection to survivors with NRPF and enable them to access domestic abuse services, particularly refuge.

**B**

In the Domestic Abuse Commissioner report two very specific scenarios to improve outcomes for migrant survivors were detailed.<sup>11</sup> The most promising of those scenarios, if adopted, could generate overall social gains worth almost £2.3 billion over 10 years of supporting migrant survivors.

**C**

Similar social and economic benefits were outlined by the Mayor of London commissioned research on the cost-benefit analysis of removing the NRPF policy. This study found that 'the benefits of scrapping the NRPF policy far outweigh its costs, leading to net societal gains of up to £872 million'.<sup>12</sup>

## THE POLICE SHOULD:

**1**

**Take comprehensive and mandatory trainings on how to adequately respond to cases of Black and minoritised women subjected to violence.**

HOW AND WHY?

**A**

Black and minoritised women have repeatedly reported being unprotected, disbelieved, discriminated against and further criminalised whilst dealing with the police. As an enforcement agency, the Police has not shown a supportive role. **This has to change.** The police must ensure that they do not exert further harm and

that they are prepared to respond to domestic violence cases appropriately and in a non-discriminatory manner.

## B

Police officers who need to access safe spaces for survivors of abuse (such as refuges), should take care and ensure that in these **exceptional instances**, such duties are taken over by female police officers and are conducted with the appropriate sensitivity. Unfortunately, women living in our refuges, who experience a number of intersectional inequalities such as race, language barriers and insecure immigration status, have reported receiving a heavy-handed response from the police, unable to understand what the police are saying, and feeling that they are treated as criminals.

## C

Specific areas of training identified include:

\*Compliance with Public Sector Equality Duty.

\*How to appropriately respond to Black and minoritised women specific experiences and needs in regard to gender-based violence. Specifically, we would strongly suggest introducing Valerie's Law for mandatory cultural competency training for professions around the cultural nuances and barriers, colloquialisms, languages and customs that make up the diverse black and minoritised communities in the country, as called for by Sistah Space.

\*Their duty to refer cases to local housing authority under Homelessness Reduction Act 2017.

\*Their powers to make appropriate use of Domestic Violence Protection Notice (DVPN) and Domestic Violence Prevention Order (DVPO) to remove perpetrators from a house at least until safer accommodation is made available for Black and minoritised survivors. Currently, the new civil Domestic Abuse Protection Notices (DAPNs) and Domestic Abuse Protection Orders (DAPOs) are hardly (if ever) used by the Police. Instead, they continue to maintain bail conditions as the mechanism to protect survivors.

\*Identification and provision of **accessible information** to Black and minoritised survivors who are homeless or threatened with homelessness regarding diverse referral pathways, making referrals to Black and minoritised services and refuges, where Black and minoritised women identify the need to do so. We have been very concerned to witness multiple instances where police is not only failing to put in place interpreters for survivors from our community, but also failing to ensure that such interpreters are themselves suitable trained to be **objective and unbiased in their interpretation job**. Similarly, it is unacceptable that the police is not sensitive enough to understand that interpreters selected for these cases should be female and with appropriate cultural sensitivity to adequately support survivors from minoritised backgrounds.

*In one instance we observed how the police provided a Portuguese (from Portugal) male interpreter for one of our Brazilian service users. As we were supporting her, and understand the language, we could clearly notice how he was not conveying the information in an objective way, including making veiled, culture specific sexist and racist remarks about the survivor.*

## LAWA support worker testimony

### 2

**Make appropriate use of Domestic Violence Protection Notice (DVPN) and Domestic Violence Prevention Order (DVPO) to remove perpetrators from a house at least until safer accommodation is made available for Black and minoritised survivors.**

#### HOW AND WHY?

##### A

Our evidence shows that the police are failing to make appropriate use of DVPN/DVPO when attending to domestic violence cases. There were instances where after calling the police, upon arrival Black and minoritised survivors were told they could not do anything to remove perpetrators from the house because the perpetrator owned/rented it. This kind of scenario has become increasingly hostile for survivors during the current housing crisis. In other cases, Black and minoritised survivors were removed from their homes by the police and left unsupported having nowhere to go, with some having to sleep in the police station.

##### B

On the flip side, we have also observed some instances of good practice from the part of the police, for example when providing basic safety information to support survivor's relocation from their danger borough. Unfortunately, sometimes

Metropolitan Police officers designated to stay in touch with survivors communicate with them in patchy and inconsistent manner, which can create further mistrust and distance between service users and the authorities.

##### C

According to Article 5(2) of the Istanbul Convention and in accordance with the case law of the European Court of Human Rights, the States must oblige with the principle of due diligence. This means that the Police must respond to violence in a diligent manner to combat and prevent further acts, which, importantly, implies also a requirement for sufficient resources to be allocated to the police for these purposes.

### 3

**Stop the pervasive practice of data sharing about survivors of Domestic Abuse with Immigration enforcement authorities. This practice forces survivors to stay with their abusers because they are too scared to contact police. Abusers often utilise arguments connected to immigration status (threatening women with deportation) to exert control and coercive behaviours against survivors.**

## HOW AND WHY?

### A

As noted by Latin American Women's Rights Service (LAWRS), following super complaint on the issue around data sharing for immigration enforcement, it is crucial to make it clear that this type of data sharing does NOT help safeguarding victims. Instead, they would receive an immigration enforcement letter or be detained as a result of their reporting abuse to the police. This undermines the fight against crime as it has a real deterrent effect on people with insecure immigration status seeking the support of the police.<sup>13</sup>

***We join calls made by Latin American Women's Rights Service (LAWRS) and the #StepUpMigrantWomen Campaign for the implementation of safe-reporting mechanisms and an end to data-sharing policies when victims with insecure immigration status report abuse.***

**For more information visit: <https://stepupmigrantwomen.org/>**



## Women Against Homelessness & Abuse

## THE LONDON MAYOR AND THE GREATER LONDON AUTHORITY (GLA) SHOULD:



### HOW AND WHY?

#### A

Local VAWG Strategies should align with the four priorities of the national VAWG Strategy 2021-2024, prioritising prevention, supporting victims, pursuing perpetrators and a stronger system. They should also align with the National Statement of Expectations, the Public Sector Equality Duty and the Equality Act 2010 to ensure survivors with protected characteristics as well as those with intersecting disadvantages have access to the support services they need.<sup>14</sup>

#### B

As local commissioners in London, the GLA must ensure the response to VAWG by Tier 2 Local Authorities is collaborative, robust, and effective. This means i) Put the victim/survivor at the centre; ii) Clearly acknowledges the gendered nature of VAWG iii) Ensures safeguarding pathways maintain perpetrators at bay in order to keep survivors (and those at risk) safe; iv) Take a strategic, system wide approach to commissioning; v) Be locally-led and safeguard individuals throughout; vi) Raise local awareness of the issues and involve, engage and empower communities to seek, design and deliver solutions to prevent VAWG.

#### C

In line with the growing understanding of the added value of delivering by and for services, the Mayor should extend the commitment in the Domestic

### 1

**Work with London local authorities to develop and enforce new standards and protocols to ensure consistency of VAWG-ending service provision across London. Particularly, concerted efforts need to be made to ensure that housing officers understand women's legal entitlements to housing, especially relating to domestic abuse. The practice whereby housing authorities only act lawfully when they are threatened with legal action must come to an end.**

Abuse Safe Accommodation Strategy that his ‘commissioning processes and requirements do not disadvantage small, specialist and ‘by and for’ providers, and support capacity-building’, to all housing services commissioned by the Mayor.<sup>15</sup>

## 2

**Allocate resources to enable the development of second stage/ move-on accommodation schemes and pathways for survivors, through a variety of models, including small & medium size scale projects that would facilitate community based, by and for providers to enter the marketplace without being at a disadvantage in comparison with larger, generic VAWG and housing providers.**

### HOW AND WHY?

#### A

Current approaches to move-on accommodation are very disjointed and ineffective. More coordinated efforts would help women to have a less-retraumatising experience after exiting the violence and would also contribute to solve some of the existing demands on local housing. The strong local links of community based, by and for organisations can be capitalised in more creative and cost-effective ways to enable sustainable solutions to the housing needs of black and minoritised survivors.

#### B

In 2021/2022, councils spent at least £1.6 billion on temporary accommodation for homeless households.<sup>16</sup> For this reason, measures such as clearer and more direct allocation schemes in local authorities (which are particularly tailored to address the needs of the most disadvantaged survivors) would be an important step in the right direction.

## 3

**Work with London local authorities to deliver support to women in need of housing, especially those that are survivors of abuse, such as tenancy guarantees and providing effective help finding longer term housing, with an emphasis in social housing rather than in the private rented sector (PRS).**

### HOW AND WHY?

#### A

It is well known the high cost of renting privately and how this creates a barrier for the most vulnerable. There is no region in England where private rented housing is affordable on women’s median earnings, whereas men can afford to rent a median home (median private sector rental cost) in all regions except London.<sup>17</sup>

#### B

Given that reality, the PRS needs to be substantially more regulated to ensure that it is affordable and safe for women, should this be the only option available to them.

#### C

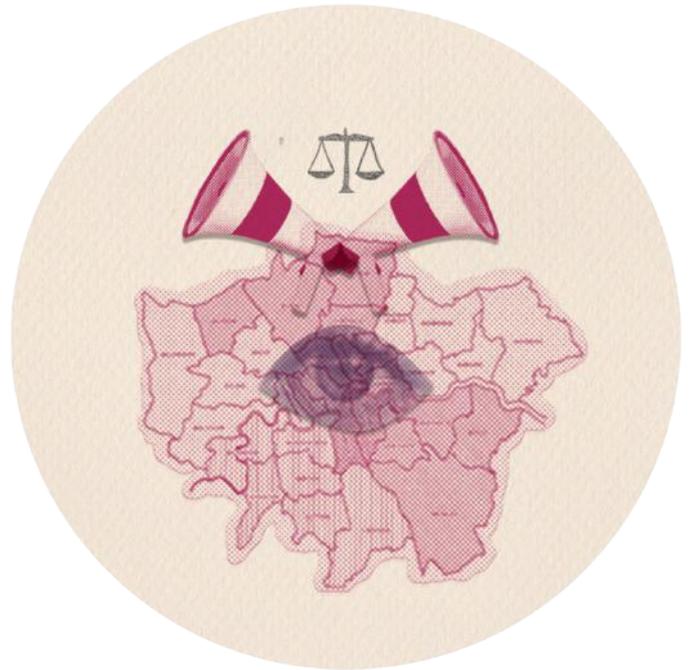
The Greater London Authority is better placed to take up leadership and responsibility for regulating the PRS in London to ensure that private landlords follow best practise and support rather than hinder survivors’ pathways to healing and independent living. For example, now there is no requirement for local authorities to record their regulatory activity in relation to the private rented sector, or to report such information to DLUHC. A mandated record keeping mechanism could be a first step to be taken to better understand number of complaints, the number of inspections, or the number of staff who carry out tenancy relations duties that tackle harassment and illegal evictions.<sup>18</sup>

## D

Alongside this, developing clear and detailed communications to women on housing waiting lists who are being discharged into the PRS would be greatly beneficial for survivors and their advocates. As proposed by the Women's Budget Group, having tenancies targeted to women where affordable rent are set to local women's wages rather than general average wages could be greatly beneficial to start bridging the gap of affordability and gender disparity in the capital.<sup>19</sup>

## E

Ensure that Housing authorities locally consult with an expert panel of local people with lived experience of seeking homelessness assistance in their area when planning how to implement these duties. For the plan to be realistic, the guidance should not only require authorities to take account of local housing markets, by assessing prospects of finding an affordable private rental in the area, but also the prospects of finding suitable social housing in the locality.<sup>20</sup>



# ALL LOCAL AUTHORITIES IN LONDON SHOULD:

## 1

**Have clear and consistent guidelines in terms of how to facilitate accommodation for survivors of abuse. Demanding local connections to survivors of abuse must stop and social services must make their assessments swiftly and correctly.**

### HOW AND WHY?

## A

As established in the 21.17 section of the Homelessness Code of Guidance, Local

authorities must recognise the clear need for victims of abuse and their children to be able to travel to different areas in order for them to be safe from the perpetrator, and housing authorities should extend the same level of support to those from other areas as they do to their own residents. Unfortunately, in spite of the passage of the Domestic Abuse Act in 2021 we continue to see Local Authorities demanding a local connection in cases where homelessness assistance is in fact owed to survivors of domestic abuse.

## B

In the case of survivors with children who should be entitled to support under section 17 of the children act, what we commonly see is that they are incorrectly assessed as non-recourse to public funds and are left homeless while they are doing the assessment. If this practice is not reversed, this could amount not just to a breach of the Children's Act, but also to indirect discrimination. We are also seeing in the refuges that women are not being granted their housing benefit from the date the DDVC was approved. Which again, shows lack of knowledge by the officer reviewing the applications.

## 2

**Create specific referral pathways with their not locally commissioned by and for services.**

### HOW AND WHY?

#### A

Because we are not locally commissioned, organisations like LAWA are not part of the official referral pathways in the Local Authorities. This means that few -if any- referrals are in fact made to us by the local social services team or police. Connected to that we have the very real situation that a large portion of women in vulnerable conditions from our community would not necessarily trust going to the police or the council in the first place if a situation of abuse happens, for fear of immigration control.

#### B

Given all this, local authorities in housing teams must be sensitive to these realities and adopt appropriate measures to ensure survivors from minoritised backgrounds are adequately supported

and not disproportionately disadvantaged by incorrect or delayed assessments of their situation of vulnerability.

## 3

**Ensure they meet their safe accommodation duty or their interim accommodation duty (as appropriate) by ensuring their stock of Temporary accommodation units meet minimum standards of suitability.**

### HOW AND WHY?

#### A

Enforcing that properties are inspected before people are moved into them.

#### B

Ensuring the properties are adequately staffed so survivors have the possibility to raise any concerns effectively and in a timely fashion. Linked to this, it is very important that housing officers from Local Authorities have appropriate levels of contact with survivors to avoid re-traumatisation.

#### C

Automatically awarding all women accepted for rehousing as a result of VAWG the highest possible banding/points.<sup>21</sup>

***We strongly advise that Tier 2 Local Authorities follow closely recommendations made by the [Local Government and Social Care Ombudsman](#) in relation to improvements that council services should make to better support domestic abuse survivors.***

**[\(Available here\).](#)**



LAWA and our partners in the [OYA Consortium](#) in London, meet once a month to discuss challenges and practical solutions in this and other areas of advocacy. If you are interested in sharing a particular challenge or wish to collaborate with us in disseminating practical useful information about any of the policy and practice areas discussed in this briefing, [please contact us at info@lawadv.org.uk](mailto:info@lawadv.org.uk).

**PLEASE MAKE SURE YOU MARK YOUR E-MAIL USING THE SUBJECT 'OYA LEARNING HUB' SO WE ENSURE THE REQUEST IS PICKED UP!**

# 4

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- <sup>3</sup> Women's Aid Federation: [Funding a national network of refuges: providing a lifeline for families fleeing domestic abuse \(2018\)](#). p. 3.
- <sup>4</sup> Home Office [VAWG Commissioning Toolkit](#). December 2016.
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- <sup>10</sup> Exempt Accommodation & Domestic Abuse Briefing. March 2023, Authored by the National Housing and Domestic Abuse Policy and Practice Group/ Standing Together Against Domestic Abuse.
- <sup>11</sup> Safety before status: [The Solutions](#). Domestic Abuse Commissioner of England and Wales. July 2022
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# WAHA

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