



**domestic  
abuse  
commissioner**

Domestic Abuse Commissioner for England and Wales  
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Rt Hon Michael Gove MP  
Secretary of State for Levelling Up, Housing and Communities  
2 Marsham Street  
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21 June 2023

Dear Rt Hon Michael Gove MP,

I am writing to express my appreciation for the work of your Department and your officials, and to highlight some key policy areas where I believe important steps could be taken to support victims and survivors of domestic abuse. I have already had the pleasure of working closely with your Minister for Housing and Homelessness, Felicity Buchan, and have worked very positively with Rachel Maclean, Minister for Housing and Planning, in her former roles.

Domestic abuse affects 2.4 million victims every year, and has a devastating impact on them, their families, and society as a whole. Safe and stable housing is critical for victims and survivors of domestic abuse, who, as a result of their experiences, have faced instability and a lack of safety at home.

Refuges are a critical support for victims and survivors of domestic abuse, but they are not the only housing-related need. The Whole Housing Approach to domestic abuse spans work from street homelessness to the private rented sector, providing a framework for the domestic abuse and housing sectors to work together to address all the housing needs of victims and survivors. It brings together the main tenure types and temporary accommodation settings which victims and survivors may find themselves in – including refuges, supported housing, and the private rented sector – and provides the necessary join up to specialist support initiatives needed to help people experiencing domestic abuse. This approach enables housing outcomes to be delivered in a safe, trauma informed way, which takes into account the specific needs of the survivor and their children.

Thanks to generous funding granted by the then MHCLG, the first Whole Housing Approach project – which I was involved with prior to my appointment to the role of Commissioner – was piloted in 2018, and I am pleased to see that there are a number of opportunities for your Department to continue to support this initiative and improve survivors' options and access to safe and secure housing.

I would like to take this opportunity to detail some of the changes I would hope to work with your department to achieve.

### **Implementing Part 4 of the Domestic Abuse Act**

Part 4 of the Domestic Abuse Act – the Safe Accommodation Duty – provides a critical opportunity for local areas to consider the housing needs of victims and survivors of domestic abuse and has the potential to provide life changing support in accommodation-based services. It was positive to see the importance of safe, supported accommodation for victims and survivors recognised on the face of the Domestic Abuse Act, and it has been a privilege to support your Department in overseeing its implementation as co-chair of the Domestic Abuse Safe Accommodation National Expert Steering Group.

However, without a formalised governance and accountability structure to monitor risks and concerns, I am concerned that some local areas will not meet the requirements of the Duty as intended, resulting in poor delivery and misuse of public money. I understand and respect the knowledge and authority of local decision makers and have discussed this with Minister Buchan and your officials, but I remain concerned that because funds for the Duty are not ringfenced, monitoring – particularly in the early years – will be crucial to lay a foundation of well-funded, robust provision which encourages local authorities to routinely put aside adequate funding moving forward.

I also understand that the evaluation of the Duty is ongoing and look forward to working with the team as it continues to develop, but I believe that more regular monitoring needs to be done to understand the current state of play and impact of the Duty funding for all local authorities.

One way that this could be done is by reviewing the strategic needs assessments produced by local authorities as part of the Duty, as they contain a wealth of information which would provide a clearer sense of the state of local provision as well as progress in this area. It will be important to ensure the quality of these assessments from all Local Authorities, not just a select few, in order to maximise the impact of Part 4 and the significant investment associated with it. I am committed to working with your Department to ensure the appropriate measures are in place, and would be very interested in discussing the specifics of this further.

### **Supported Housing (Regulatory Oversight) Bill**

As you will be aware, the lack of regulatory oversight in the exempt accommodation sector has led to an increase in 'rogue providers' who provide little to no support to their tenants while claiming enhanced Housing Benefit and charging higher rents, threatening the safety of these tenants – some of whom are victims and survivors of domestic abuse – as well as in some cases encroaching into the domestic abuse sector and branding themselves as specialist services.

It is positive to see a step towards the reform and regulation of this sector in the form of the Supported Housing (Regulatory Oversight) Bill which is supported by your Department. I look forward to further discussions with your officials about how this important regulation can improve support and living conditions for victims and

survivors in supported exempt accommodation, without unnecessarily overburdening specialist providers who are already operating a good quality service.

### **Private Rented Sector reforms and domestic abuse**

I very much welcome the introduction of the Renters' Reform Bill and its provisions to end Section 21 'no-fault' evictions. However, I am deeply concerned about the amendments to Ground 14 and the introduction of Ground 8a as mandatory, which would make it easier for landlords to evict tenants for anti-social behaviour and rent arrears. Tenants who are experiencing domestic abuse are four times more likely than other tenants to have ASB complaints made against them, due to the misidentification of domestic abuse as ASB, and tenants who are experiencing economic and financial abuse may fall into rent arrears as a result of the perpetrator's actions.

I would encourage your Department to take this into consideration by maintaining the discretionary nature of Ground 14 and potentially introducing a pre-eviction protocol for this ground, changing Ground 8a from mandatory to discretionary so that judges can take economic and financial abuse into consideration, and developing guidance on ASB and its overlaps with domestic abuse which can be accessed via the proposed Property Portal.

### **Housing First**

Housing First is a housing and support model for people who have experienced long term, chronic homelessness and have not been able to be housed in traditional pathways, often as a result of facing multiple vulnerabilities. In this model, housing is prioritised so that survivors can begin recovery with guaranteed independent, stable housing. This is a crucial part of the Whole Housing Approach.

I have been pleased to see your Department fund pilot projects in the West Midlands, Greater Manchester, and Liverpool City Region, and hope to see a continuation of this funding. In their recently published report *Home for Good*, the Centre for Social Justice make the case for a Government-funded Housing First scheme for domestic abuse survivors, and we have seen existing Housing First schemes specifically for survivors of VAWG result in very high tenancy sustainment rates. For example, the Westminster VAWG Housing First project run by Standing Together Against Domestic Abuse and Solace Women's Aid has had an overall tenancy sustainment of 93% over its three years of operation. Given the success of your Department's existing work on Housing First, I would be interested in exploring funding opportunities for a Housing First scheme, specifically for victims and survivors of domestic abuse.

I would welcome the opportunity to meet with you to further discuss the issues outlined above, and would like to extend an offer for your Department to reach out to my office at any time for advice and support on any aspect of the Department's work which may relate to and affect victims and survivors of domestic abuse.

I look forward to continuing to work with you and your Department to ensure that victims and survivors across England and Wales are able to access the accommodation and support services that they need.

Yours sincerely,

Nicole Jacobs

A handwritten signature in black ink that reads "Nicole Jacobs". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Domestic Abuse Commissioner for England and Wales