



**domestic
abuse
commissioner**

Domestic Abuse Commissioner for England and Wales

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10 July 2024

Rt Hon Angela Rayner MP
Secretary of State for Housing, Communities and Local Government
2 Marsham Street, London, SW1P 4DF

Dear Secretary of State,

I would like to warmly welcome you to your new role as Secretary of State for Housing, Communities and Local Government. Since my appointment as the first Domestic Abuse Commissioner for England and Wales in September 2019, I have had the privilege to act as an independent voice for victims and survivors of domestic abuse, drawing on my 30 years' experience in domestic abuse services, policy and intervention. I have used my statutory powers, which are set out in the Domestic Abuse Act 2021, to hold both agencies and government to account in tackling domestic abuse and to raise public awareness. I have had the pleasure of working very closely with the previous Government to help improve the support provided to the 2.1 million victims and survivors of domestic abuse every year and to hold perpetrators to account. I very much look forward to continuing this work with you in your new role.

I note with interest your previous membership on the APPG for Domestic Violence, and strongly welcomed the important concerns you raised during debate on the Renters Reform Bill regarding the impact on victims of domestic abuse. I have no doubt that your work in these areas will prove invaluable in embedding a strong understanding of domestic abuse within the Ministry of Housing, Communities and Local Government.

Housing: A domestic abuse issue

Domestic abuse is inherently a housing issue, with home often being the most unsafe place for victims and survivors. Domestic abuse is increasingly [recorded](#) by those accessing temporary accommodation as the reason for housing loss or threat of housing loss. Following the passage of the Domestic Abuse Act 2021, survivors experiencing homelessness are considered to have priority need. However, as a result of legislative oversight, victims of domestic abuse who present to their Local Authority as homeless will not be guaranteed support in safe accommodation, but rather are more likely to be placed in temporary accommodation. The [Local Government Association](#) highlights that between April 2022 and March 2023, local councils spent £1.7 billion on temporary accommodation for homeless households. Emergency B&Bs and hostels are however

fundamentally unsafe places for victims and their children to stay when fleeing abuse as they do not provide adequate safeguarding.

In the face of the many housing challenges facing domestic abuse survivors, the [Whole Housing Approach](#) has been developed by the Domestic Abuse Housing Alliance ([DAHA](#)) and the National Housing and Domestic Abuse Policy and Practice Group. This project, which has been piloted and [evaluated](#), provides a framework for 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.

The role of MHCLG

Responding to domestic abuse is everybody's business; every part of the local community and every statutory agency has a role to play, in partnership with specialist services. In the same way, an effective national response to domestic abuse requires a multi-disciplinary approach which utilises the whole of the government's apparatus. As set out in your Manifesto's 'mission led' approach, tackling domestic abuse must be a genuine cross-Departmental priority for this new Government – working together to fully harness levers of change, overseen by robust governance and accountability and driven from the very heart of Government.

Your Ministry has a critical role to play in this response, especially following the introduction, via the Domestic Abuse Act 2021, of a statutory duty on Local Authorities to provide safe accommodation for victims of domestic abuse. This was a significant step forward built upon years of campaigning by specialist sector partners. It is imperative that the Ministry maintains robust oversight and accountability mechanisms for implementation and progress against this duty. Currently, there is a lack of local transparency about how funds are spent, and I am concerned that post April 2025, the dedicated Section 31 grants that provide direct funding to local authorities may come to end.

Additionally, as highlighted in my recent [letter](#) to the previous Secretary of State, the current financial crisis facing Local Authorities risks cuts to life-saving community-based domestic abuse services. These services are not yet on a statutory footing but play a critical role in supporting victims before they are forced to flee their home in crisis, which causes great upheaval to their life and those of their children, as well as costing much more. There should therefore be strong incentive to ensure community-based services are sufficiently funded, and your Ministry has an important and influential voice in communicating this.

I welcomed in your recent Manifesto a number of commitments which I would be pleased to work on with you collaboratively. This includes in particular commitments to improved regulation of the private rented sector and abolition of 'no fault' evictions, and a new cross-Government strategy to end homelessness.

Opportunities for change

I would however urge you to build on these commitments and go further to improve safe accommodation options for domestic abuse victims and their children. I would like to take this opportunity to draw your attention to the recent briefing I shared with Officials, which sets out my

key issues and priorities for the Ministry. This is attached to this correspondence for your reference. In this briefing I also put forward a number of recommendations, including:

- Funding for the Safe Accommodation Duty remains a separate Section 31 grant beyond April 2025;
- Ensure a robust governance and accountability mechanism to monitor concerns about local implementation of the Safe Accommodation Duty, help identify systemic issues, and hold Local Authorities to account;
- In light of increasing Section 114 Notices, urgently provide guidance to Local Authorities on the importance of commissioning independent, specialist domestic abuse services, including 'by and for' services, in the community, safeguarding vulnerable adults and children and meeting a wide range of statutory duties;
- Government to commit to re-introducing the National Housing First pilot specifically for victims and survivors of domestic abuse with multiple disadvantages;
- Guidance is provided to Local Authorities, encouraging them to house survivors including children in safe accommodation, and where it is not possible, to ensure their safety in temporary accommodation is provided through the use of single sex, contained units;
- Ensure Section 21 'no fault' evictions are ended;
- No changes are made to the ASB ground for eviction, and it remains discretionary;
- Collaboration between the Domestic Abuse Commissioner's Office and MHCLG is utilised and developed to ensure practice realities are reflected in ambitious policy changes.

May I please urge you to read this document in full and give my recommendations your careful consideration. I believe that they are an imperative step towards achieving and delivering truly ambitious change within housing, supported accommodation and homelessness. By implementing the full scope of recommendations, this will ensure that victims and survivors, including children, can all access the life-changing and life-saving support they need and deserve.

Working Together

During my tenure, my Office and I have met regularly with Officials in the Ministry, particularly the Supported Housing Team. I have also co-chaired the quarterly [National Expert Steering Group](#) with the previous Minister for Housing and Homelessness, with the aim of driving further ambitious change and continuous improvement to enable victims to access safe and secure housing. It is my strong aspiration to continue this important work with your Government.

My Office works independently of any organisation or political party to amplify the voices of victims and survivors of domestic abuse. My small team of domestic abuse experts develop policy, conduct research, and collect practitioner insight to ensure that we remain at the forefront of understanding of what victims and survivors need, and are well placed to offer solutions. We remain available to you and your colleagues across Government to engage and advise on all issues relating to domestic abuse – as well as to facilitate, wherever needed, invaluable connections to the specialist sector and to victims and survivors themselves.

I would very much welcome the opportunity to build a strong collaborative relationship with you in your new role, beginning with a discussion at your earliest convenience on the important issues set out in this letter and attached briefing. If your team could please advise my Office of your upcoming availability, I would look forward to starting this conversation with you.

Yours sincerely,

Nicole Jacobs

A handwritten signature in cursive script that reads "Nicole Jacobs". The signature is written in a dark ink and is positioned below the printed name.

Domestic Abuse Commissioner for England and Wales