

Supported Housing regulations consultation:

Domestic Abuse Commissioner response

Role of the Domestic Abuse Commissioner

The Domestic Abuse Act establishes in law the Office of the Domestic Abuse Commissioner for the purpose of providing public leadership on domestic abuse issues and to play a key role in overseeing and monitoring the provision of domestic abuse services in England and Wales. The role of the Commissioner is to encourage good practice in preventing domestic abuse and improve the protection and provision of support to people affected by domestic abuse, by holding agencies and Government to account. The Domestic Abuse Commissioner welcomes the opportunity to feedback on the Governments consultation on the proposed supported housing regulations and would be open to discussing the contents of this response further, if requested to do so.

This response will set out the Commissioner's overarching position and key recommendations, before responding in more detail to address the four themes within the consultation:

- National Supported Housing Standards and Principles,
- The Licencing Scheme,
- A definition of care, support and supervision in Housing Benefit regulations; and
- The proposal to link Housing Benefit with standards and licensing.

Intersectionality

The Domestic Abuse Commissioner understands the need to continually refine an intersectional lens by listening to all victim/survivors of domestic abuse, including children, no matter who they are or where they are located, and encourages Government to take a similar approach.

Domestic abuse does not exist in a single form. It is unique to each person's situation and history. Different forms of domestic abuse, including controlling and coercive behaviours, coexist in most contexts and it is important to understand how power and control manifest in these situations. 'Race'/ethnicity, age, gender, religion, sexuality, socio economic status, immigration status, disability status and other ways in which victims/survivors identify plays a crucial role in their experience of abuse, its impact and their ability to access pathways of support and recovery.

Specialist pathways of support as well as any attempt to understand victim/survivor needs should be responsive to the multiple contexts of oppression and vulnerabilities that they experience. Intersectionality, a term coined by Kimberley Crenshaw, is firmly located in Black women's experiences of racism and multiple forms of oppression, including domestic abuse.¹ This is a powerful lens that enables us to understand victim/survivor experiences as a whole and identify systemic oppression and marginalisation.

Overarching position

The Domestic Abuse Commissioner is encouraged to see Ministry of Housing, Communities and Social Housing (MHCLG) and the Department of Work and Pensions (DWP) strengthening the provision of supported housing for residents. The Commissioner has raised long standing concerns about the growth in poor quality, potentially dangerous supported accommodation providers seeking to house adult and child victims and survivors of domestic abuse with little evidence of any domestic abuse support or expertise around safe practice for survivors of domestic abuse.

When a victim of domestic abuse flees their home and abusive partner to seek safe accommodation, it is often the most dangerous time in their journey toward safety and recovery. Leaving an abusive partner can increase the risk of post-separation abuse, including stalking, harassment, economic abuse and physical violence. Research has shown the risk of domestic homicide significantly increases during this period², therefore it is critical that victims seeking safe accommodation receive access to appropriate, high-quality accommodation.

Refuges and dispersed properties run by independent domestic abuse services and 'by and for services' along with registered social landlords with dedicated refuge provision, provide victims of domestic abuse with holistic, specialist support in a supportive, safe and secure environment. Victims who enter supported accommodation have a range of support needs which are all unique, dependent on their circumstances and experiences of abuse. This includes support needs relating to safety, criminal and family justice, disability, physical and mental health, immigration status, children's welfare and education, financial needs including debt, and social needs.³

Domestic abuse refuges currently make up only approximately 1% of the current supported housing provision.⁴ In between April 2023 to March 2024, the number of

¹ Columbia Law School (2017). *Kimberlé Crenshaw on Intersectionality, More than Two Decades Later*. [online] [www.law.columbia.edu](https://www.law.columbia.edu/news/archive/kimberle-crenshaw-intersectionality-more-two-decades-later). Available at: <https://www.law.columbia.edu/news/archive/kimberle-crenshaw-intersectionality-more-two-decades-later>.

² [Key findings from analysis of domestic homicide reviews: September 2021 to October 2022 \(accessible\) - GOV.UK](#)

³ [4 -wha-refuge-services.pdf](#)

⁴ [Supported Housing Review 2023: Executive summary - GOV.UK](#)

adults and children supported in safe accommodation was 63,950 in 2023-24, an increase of 13,280 (26%) compared to 2022-23.⁵ The Commissioner would like strongly recommend caution in putting forward any recommendations which take a broad-brush approach to domestic abuse safe accommodation providers as some provision will be ran independently within the community with some ran by registered social landlords. Refuges make up a small portion of supported housing providers and play a specialist role within the sector therefore strongly suggests government takes a bespoke approach to these providers.

The Commissioner is concerned that the proposed national supported housing standards and licencing will divert already scarce funding away from specialist domestic abuse and 'by and for' services which could potentially lead to cuts in services or closures. While the intention behind the standards licensing fees is to ensure quality and accountability, the potential negative impacts on refuges highted within this response need careful consideration to ensure these essential services are not significantly impacted.

The Commissioner would like to see MHCLG commit to mapping the current domestic abuse refuge provision across England and Wales prior to any implementation of the proposed national standards and licencing. This will undoubtedly help address any potential implications or unintended consequences in which I have identified throughout this response.

Summary of the Commissioner's recommendations

1. MHCLG and DWP should consider exemptions for domestic abuse providers who have acquired National Quality Standards, accreditation and/or commissioned by local authorities under Part 4 of the Domestic Abuse Act.
2. MHCLG should stipulate in guidance that all providers of supported accommodation implement a trauma-informed approach to their assessments that is grounded in and directed by a complete understanding of how trauma exposure affects service user's neurological, biological, psychological and social life experience.
3. Licencing teams should only request appropriate and proportionate photographic evidence of domestic abuse refuges to meet this standard, with the clear guidance stipulating rationale.
4. The environment standard should ensure residents are protected from discrimination under the Equality Act 2010.

⁵ [Support in Domestic Abuse Safe Accommodation - GOV.UK](#)

5. Guidance on the local need standard should be clear and robust to ensure licensing teams and local authorities do not reject applications for this reason and that these highly specialised domestic abuse refuges are protected from any interpretation of this standard by licencing teams.
6. A further consultation period should be held once MHCLG has identified who the licensee will be.
7. Domestic abuse services which have achieved national quality accreditation, are listed on Routes to Support and who are commissioned through the Part 4 Safe Accommodation funding allocations; should be granted an exemption in paying licence application fees.
8. Licencing teams should offer a degree of flexibility along with support to achieve standards/finance the licensing fee, to ensure there is minimal impact on 'by and for' services.
9. The proposed 'fit and proper person test' should go beyond checking for information such as criminal convictions, unlawful discrimination, and civil proceedings relating to housing or landlord and tenant law. It should include broader background checks for applicants such as checks on Companies House, Charity Commission, and applicants who are linked with real estate or investment trusts.
10. The proposed definition of a Scheme should be permitted to submit a single licensing application covering multiple buildings, and that one licensing fee applies to a single application (that may have multiple schemes).
11. Accompanying guidance should provide licence teams with a clear set of bespoke conditions for inspections for domestic abuse refuges so that confidentiality and safety of the victims is respected at all times.
12. Licensing teams should apply flexibility for smaller domestic abuse providers and 'by and for services' to be able to provide evidence towards their national standards and to funding licencing fees. Caution should be taken in putting forward any recommendations which take a blanket approach to restricting specialist domestic abuse providers who are not commissioned or working towards their respective National Quality Standard.
13. Following the national implementation of the licence and standards, MHCLG should consider ringfencing funding dedicated to training for licencing teams, including training on domestic abuse, homelessness and multiple disadvantage such as DAHA Accreditation for Homelessness & Supported Housing through the new burdens funding.

14. The Department for Work and Pensions should update the Regulation 75H within Housing Benefit Regulations 2006 to accurately reflect the definition of refuge accommodation.
15. MHCLG commit to mapping the current domestic abuse refuge provision across England and Wales prior to any implementation of the proposed national standards and licencing.

Further detail

1. National Supported Housing Standards and Principles

The Commissioner **partly agrees** with the proposed standards and principles.

It is the Commissioner's view that domestic abuse services and 'by and for organisations' who are registered on Routes to Support and/or have acquired National Quality Standards through Women's Aid⁶, Imkaan⁷, Mankind⁸ and Respect⁹ will already be meeting the proposed National Supported Housing Standards and Principles outlined within the consultation.

Moreover, services commissioned by local authorities under Part 4 of the Domestic Abuse Act 2021 will be deemed to already meet quality standards outlined within statutory guidance Ministry of Housing, Communities and Local Government quality standards.¹⁰ This includes management of services within relevant safe accommodation, safety, security and dignity, residents rights and access, health and wellbeing, stability, resilience, and autonomy and the safety and wellbeing of children and young people is addressed in risk assessment and support planning. Quality standards will also be monitored through regular contract management meetings between commissioners and the providers.

Independent, specialist domestic abuse services are already under significant financial and resourcing pressures. The Commissioner's mapping research found that, in 2020-2021, 27% of specialist domestic abuse services were forced to scale back or cease some of their services due to a lack of funding. This rises to 43% for the more specialist, 'by and for' organisations who support the most marginalised communities.¹¹ The Commissioner is concerned that the proposed standards will have a significant impact on these services which are already stretched beyond their capacity and face

⁶ [National Quality Standards - Women's Aid](#)

⁷ [Imkaan Accredited Quality Standards](#)

⁸ [National Quality Service Standards - Mankind](#)

⁹ [Respect Standard | Respect](#)

¹⁰ [Delivery of support to victims of domestic abuse in domestic abuse safe accommodation services - GOV.UK](#)

¹¹ [DAC Mapping-Abuse-Survivors Long-Policy-Report Nov2022 FA.pdf](#)

recruitment and retention difficulties, due to the uncertainty of future contracts amidst a cost-of-living crisis.

The domestic abuse sector's own National Quality Standards and accreditation schemes, along with Part 4 statutory guidance has over the years, have vastly improved the quality of provision and support for victims of domestic abuse. Therefore, **the Commissioner wishes to strongly recommends Government to consider exemptions for domestic abuse providers who have acquired National Quality Standards, accreditation, and/or are commissioned by local authorities under Part 4 of the Domestic Abuse Act.**

If the above proposal is not accepted, the Commissioner wishes to provide the specific feedback below on the proposed standards outlined within the consultation.

Person-centred support standard

The Commissioner **agrees** with the proposed evidence required to demonstrate a provider is meeting the person-centred support standards.

In 2023-24, 36,870 women, 1,830 men, 320 trans adults and 24,940 children were supported in safe accommodation. More than half (53%) of individuals supported having at least one specialist characteristic including black and minoritised survivors (25%), mental health survivors (23%) disabled survivors (14%).¹²

The Commissioner would like to therefore also recommend that future supported housing guidance stipulate all providers of supported accommodation implement a trauma informed approach to their assessments that is grounded in and directed by a complete understanding of how trauma exposure affects service user's neurological, biological, psychological and social life experience.¹³

Empowerment standards

The Commissioner **agrees** with the proposed evidence required to demonstrate a provider is meeting the empowerment standards.

Environment standards

The Commissioner **partly agrees** with the principles highlighted within the environment standards but does have concerns to several proposed pieces of the evidence required:

¹² [Support in Domestic Abuse Safe Accommodation - GOV.UK](#)

¹³ [Trauma-Informed Practice: A Toolkit for Scotland](#)

- *Photographic evidence of the accommodation*

Domestic abuse refuges keep their address and location confidential to ensure the victims they are supporting are housed in a safe environment away from their perpetrator. Confidentiality must be strongly acknowledged within guidance for this evidence standard with clear directions around information sharing to local licencing teams.

The Commissioner strongly recommends that licencing teams only request appropriate and proportionate photographic evidence of refuges to meet this standard, with the clear guidance stipulating rationale.

- *Repair policy*

The Commissioner wishes to highlight that a majority of domestic abuse refuge providers lease their properties from registered social landlords or private landlords. Future guidance must clearly state whether it is the landlord or the supported accommodation provider who holds the responsibility to meet the proposed repair policy standard.

In 2023–24, 79.6% of domestic abuse refuge services were commissioned by their local authorities for all their bedspaces in supported accommodation.¹⁴ However, it is important to recognise that commissioning does not guarantee the full funding of a service's needs. Commissioned funding may cover costs related to providing support to survivors, such as staff salaries, but does not cover the full cost to areas such as repairs, building maintenance, security, insurance, utilities, equipment for example. Likewise, the is compounded ongoing impact of the cost of living crisis.

The Commissioner remains concerned of the potential financial, resourcing and administrative burden this will place on domestic abuse provision which could lead to a reduction in support provision and/or face possible closure. Furthermore, there are additional consequences to be mindful of too, in that if the landlord is responsible for evidencing the standards, there is a risk that landlords may increase rents, service charges or possibly exit the market all together.

- *Resident risk assessments*

Data protection legislation and safeguarding measures must be applied to any information shared between organisations regarding victims of domestic abuse. The Commissioner recommends that guidance to licencing teams is clear regarding residents risk assessments for domestic abuse victims do not include any identifying personal information.

¹⁴ [Trauma-Informed Practice: A Toolkit for Scotland](#)

Additionally, the Commissioner wishes to recommend including reference to disability within the Evidence standards. The Crime Survey for England and Wales (CSEW) for the year ending March 2024 showed a higher proportion of people aged 16 years and over with a disability experienced domestic abuse in the last year than those without. Therefore, the commissioner recommends the environment standard ensures residents are protected from discrimination under the Equality Act 2010.

Staff and safeguarding standards

The Commissioner **agrees** with the proposed evidence required to demonstrate a provider is meeting the staff and safeguarding standards.

The local need standard

The Commissioner **partly agrees** with the principles highlighted within local need standards but does have concerns to several proposed pieces of the evidence required.

Victims accessing domestic abuse supported housing provision often have to flee their community and local area and seek refuge in another part of the country for their own safety. Evidence gathered by Women's Aid showed that over 79% of journeys to refuge are made from victims from a different local authority.¹⁵ The Commissioner is highly concerned that local authority licensing departments could potentially decline applications from domestic abuse providers due to services not being considered to meeting local need.

The government has already set clear guidance that it is not reasonable or practical for domestic abuse victims to be required to satisfy a local connection test in order to qualify for homelessness relief ¹⁶or social housing. However, the Commissioner is unfortunately aware that in reality, this is guidance is not always applied.

The Commissioner therefore strongly recommends that guidance on the local need standard is clear and robust to ensure licensing teams and local authorities do not reject applications for this reason and that these highly specialised domestic abuse refuges are protected from any interpretation of this standard by licencing teams.

Responsible person standard

¹⁵ [The Domestic Abuse Report 2022: Early Release](#)

¹⁶ [Homelessness code of guidance for local authorities - Chapter 21: Domestic abuse - Guidance - GOV.UK](#)

The Commissioner **agrees** with the proposed responsible person standard, however further clarity is required on if this would apply to the domestic abuse provider or the landlord.

Statement of purpose standards

The Commissioner **agrees** with the proposed statement of purpose standard.

2. The Licencing Scheme

The Commissioner **broadly supports** with the introduction of a licensing scheme by each local authority in England to ensure that the national supported housing standards are met.

Whilst the Supported Housing Act states the licensee should be the person “managing or in control” of the accommodation, more clarity is required on whether the licensee will be the provider or the landlord. Each domestic abuse provider will have varying responsibility within their own leasing terms for the accommodation they manage. The Commissioner recommends a further consultation period is held once MHCLG and DWP has identified who will be the licensee will be.

Exemptions

Domestic abuse refuges make up 1% of supported housing provision. As highlighted earlier in this response, many domestic abuse organisations, including ‘by and for services’, across England and Wales already evidence quality standards through the sector’s own accreditation schemes or through regular contract management with their local authority commissioning team.

The Commissioner therefore recommends that domestic abuse services who have achieved national quality accreditation, are listed on Routes to Support¹⁷ or who are commissioned through the Part 4 Safe Accommodation¹⁸ funding allocations; are granted an exemption in paying licence application fees.

Licensing teams should also apply flexibility for smaller domestic abuse providers and ‘by and for services’ in the provision of evidence towards their national standards and to funding licencing fees. The Commissioner would strongly recommend caution in putting forward any recommendations which take a blanket approach to restricting specialist domestic abuse providers who are not commissioned or working towards their respective National Quality Standard.

¹⁷ [Routes to Support: Database on local domestic abuse services](#)

¹⁸ [Delivery of support to victims of domestic abuse in domestic abuse safe accommodation services - GOV.UK](#)

Findings from the Commissioner's mapping of domestic abuse services across England and Wales found that 67% Black and minoritised ethnic (BME) survivors, 68% LGBT survivors and 55% disabled survivors want to access specialist 'by and for' support delivered by their communities.¹⁹ Victims and survivors from marginalised communities want to receive this support because specialist 'by and for' organisations are better able to understand the context and complexity of abuse they face and build the trust critical to effectively assess risk and provide the right support. These organisations are also able to understand the intersecting layers of discrimination faced by victims and survivors from marginalised communities. This is reflected in the outcomes of these survivors, with those who access 'by and for' support feeling safer compared to those who have accessed other types of support or have not accessed any support.²⁰

'By and for' services are more likely to provide accommodation-based services to migrant survivors with No Recourse to Public Funds however are often disadvantaged in their funding arrangements as 'by and for' services were six times less likely to receive statutory funding than specialist non-'by and for' domestic abuse/VAWG organisations and nearly twice as likely to have had to cease services due to lack of funding.²¹

As research suggests, many 'by and for' domestic abuse services are unlikely to be commissioned yet provide a high quality of tailored, specialist support that is identified as good practice in government guidance and adds significant value to the lives of victims and survivors of domestic abuse. Therefore, the Commissioner is strongly suggesting licencing teams offer degree of flexibility by licencing teams along with support to achieve standards/financing the licensing fee to ensure there is minimal impact on 'by and for' services.

The fit and proper person test

The Commissioner would like to see the proposed 'fit and proper person test' go beyond checking for information such as criminal convictions, unlawful discrimination, and civil proceedings relating to housing or landlord and tenant law.

She would strongly recommend guidance advising licencing teams to complete broader background checks for applicants, such as checks on Companies House, Charity Commission, and applicants who are linked with real estate or investment trusts. This would enable licencing teams to identify applicants who may be driven by profit and provide a wider scrutiny mechanism for to earlier identify poor quality, potentially dangerous exempt accommodation providers seeking to house victims and survivors of domestic abuse with little evidence of any domestic abuse support or expertise around safe practice for survivors of domestic abuse

¹⁹ [Briefing Paper on proposals for a specialist 'By and For' funding pot - Domestic Abuse Commissioner](#)

²⁰ [DAC_Mapping-Abuse-Survivors_Long-Policy-Report_Nov2022_FA.pdf](#)

²¹ [DAC_Mapping-Abuse-Survivors_Long-Policy-Report_Nov2022_FA.pdf](#)

Definition of a scheme

Some domestic abuse providers operate refuges and offer dispersed properties across multiple local authority areas. The Commissioner has concerns regarding the financial impact the requirement that multiple licences could have on these services.

The Commissioner therefore recommends that the proposed definition of a scheme allows for a single licensing application to covering multiple buildings, and that one licensing fee applies to a single application (that may have multiple schemes).

Proposed conditions relating to the standard of accommodation

Regarding 3.29 within the consultation (*'The licensing authority can inspect schemes applying for a licence or at any point during the licence period'*), the Commissioner would like to highlight that for domestic abuse supported housing provision, any inspections must be carefully and safely planned. The Commissioner recommends accompanying guidance to provide licence teams with a clear set of bespoke conditions for inspections for domestic abuse refuges, so that confidentiality and safety of the victims is respected at all times.

More broadly, the Commissioner has concerns regarding the potential risk of landlords of refuges exiting the market due to the introduction of the proposed standards and licences. Furthermore, victim-survivors where their supported housing providers applications have been rejected or where services have been deemed to be non-compliance with a licence will be required to source alternative housing options which could potentially place residents facing homelessness.

In 2023/24, 27,760 households were owed a relief under the homelessness duty including 25,120 victim-survivors and 2,600 alleged perpetrators.²² The Commissioner is concerned that this figure may increase if providers do exit the market. She therefore recommends training for licencing teams on domestic abuse, homelessness and multiple disadvantage such as DAHA Accreditation for Homelessness & Supported Housing.²³ Authorities must also embed a robust Supported Housing strategy which is linked with their Homelessness Strategy to prepare for any eventualities.

The Commissioner recommends that the proposed standards and licencing scheme are first introduced as a pilot phase, including in both rural and urban local authorities, to test out implementation. Whilst the Commissioner welcomes the proposed new burden funding to support local authorities make the changes required, she believes that introduction via a pilot will help ensure any issues with implementation can be assessed and addressed before a national roll-out.

²² [Tables on homelessness - GOV.UK](#)

²³ [DAHA Homelessness & Supported Accommodation Accreditation - daha - Domestic Abuse Housing Alliance](#)

3. A definition of care, support and supervision in Housing Benefit regulations

The Commissioner is **partly supportive** of DWP introducing a definition of care, support and supervision in housing benefits.

As previously set out in her written evidence to the Levelling Up, Housing and Communities Select Committee Inquiry into Exempt Accommodation²⁴, the Commissioner does have apprehensions on potential unintended consequences of how a new definition could be misinterpreted at a local level by Housing Benefit teams. If the definition of care, support and supervision is too rigid, this might not account for the variety of support needed across a victim's journey to recovery. More broadly, if local authorities interpret the definition narrowly, some domestic abuse providers may lose access to enhanced housing benefit rates, making their services financially unviable.

The Commissioner does not want to see unintended consequences whereby domestic abuse services struggle to meet the requirements within the definition, leading to a loss of housing options for victims. To avoid this, the definition should be flexible enough to accommodate diverse needs and should include or refer to quality standards from the statutory guidance on the delivery of support to victims of domestic abuse in domestic abuse safe accommodation.²⁵

Furthermore, if the definition of care, support and supervision is revised, this must include mental health with a clear focus within any supporting guidance on additional needs and multiple disadvantages.

In order to strengthen any proposed definition, the Commissioner strongly suggests that the Department for Work and Pensions update the Regulation 75H within Housing Benefit Regulations 2006 to accurately reflect the definition of refuge accommodation. Future guidance regarding the proposed licence should also include an accurate definition of a domestic abuse refuge.

Domestic abuse supported accommodation providers currently subsidise the costs of running their services through either grant income under Part 4 of Domestic Abuse Act 2021 and/or through enhanced rate Housing Benefit income. Through current legislation, Local Authorities claim back higher rate housing benefit costs that they incur through the Housing Benefit Subsidy.

²⁴ [2201-DAC-response-to-LUHC-Committee-Inquiry-into-Exempt-Accommodation.pdf](#)

²⁵ [Delivery of support to victims of domestic abuse in domestic abuse safe accommodation services - GOV.UK](#)

This means at present, Local Authorities can only fully reclaim the higher rate housing benefit costs in cases where the supported housing provider is a Registered Social Landlord. This leaves already stretched local authorities facing further financial burdens. The Commissioner has previously written to Government²⁶ to express her concern on the Local Authorities financial crisis and has strong concerns that Local Authorities may move away from directly awarding exempt housing benefit to the specialist domestic abuse providers in order to fund registered social landlords so they are able to claim the full subsidy. The Commissioner is aware in of an example in one Local Authority area where a domestic abuse refuge has been advised to restructure itself as a registered social landlord or face the risk of losing future housing benefits payments.

Additionally, the Commissioner has been made aware of multiple Local Authorities interpreting the definition of safe accommodation differently within the Housing Benefit Regulations 2006. At present, residents of a refuge must be classed as in 'Exempt Accommodation' rather than 'Refuge', or they risk not being eligible for exempt housing Benefit.

Under Regulation 75H of Housing Benefit Regulations 2006, it states there is no requirement for refuges to demonstrate the provision of care, support, or supervision for the accommodation to qualify as specified accommodation. However, the Commissioner would like to highlight that within Ministry of Housing and Communities and Local Government Statutory Guidance, the definition of domestic abuse safe accommodation states victims, including their children, will have access to a planned programme of therapeutic and practical support from staff.²⁷ Furthermore, article 23 of the Council of Europe Convention on preventing and combating violence against women and domestic violence (the Istanbul Convention), requires shelters (refuges) to be staffed by trained professionals and offer help in finding housing, legal advice, medical and psychological support.²⁸

At present, Local Authorities interpretation of the definition of safe accommodation is having a detrimental financial impact domestic abuse refuges across the country. Therefore, the Commissioner strongly recommends The Department for Work and Pensions should update the Regulation 75H within Housing Benefit Regulations 2006 to accurately reflect the definition of refuge accommodation.

4. The proposal to link Housing Benefit with standards and licensing

²⁶ [2402-XGov-Sec-114.pdf](#)

²⁷ [Delivery of support to victims of domestic abuse in domestic abuse safe accommodation services - GOV.UK](#)

²⁸ [The Council of Europe Convention on preventing and combating violence against women and domestic violence \(Istanbul Convention\) - Gender Matters](#)

The Commissioner has long been aware of providers claiming enhanced Housing Benefit for exempt accommodation with the purpose of delivering financial return to investors, rather than supporting survivors of domestic abuse. She is therefore **partly supportive** of linking Housing Benefit with standards and licensing.

There are some potential positives of this proposal, including the prevention of exploitation of vulnerable tenants by ensuring supported housing providers provide adequate support services. It may also likely reduce fraud and misuse of housing benefits by requiring landlords to meet the national quality standards before receiving funds.

This proposal also has the potential to speed up routine assessment of enhanced housing benefit claims as care, support and supervision has been evidenced within the standards. However, greater clarity is required to confirm whether housing benefit teams will no longer be asking providers to submit supplementary information with every individual claim. This could address the issue of local authorities rejecting housing benefit claims for victims in refuges on the basis that the service is not an exempt accommodation provider.