

23 January 2018

Consultation on housing costs for short-term supported accommodation - response from Refuge, the national domestic violence charity

1. Introduction

Refuge is strongly opposed to the short-term supported accommodation funding proposals, which are unworkable for refuges. Refuge is of the view that if the proposals are implemented it is extremely likely that many refuges will close and thousands of women and children will find themselves with nowhere to go. **Refuge urges the Government to remove refuges from the proposed funding model for short-term supported accommodation and create a separate funding system for refuges.**

This consultation response sets out the ways in which the short-term supported housing proposals are inappropriate for refuges and the reasons why refuges need a bespoke funding model. Refuge is ready and willing to work with the Government to develop a funding model that will put quality, specialist refuges on a secure and sustainable footing.

2. About Refuge

Refuge is the country's largest provider of specialist services for women and children escaping domestic violence and other forms of gender violence. Refuge opened the world's first refuge in 1971 in Chiswick, West London. 47 years later, Refuge supports more than 6,000 women and children on any given day.

The services Refuge provides include:

- A national network of 42 refuges, spread across 23 local authority areas, which can provide safe accommodation and specialist support to 340 women and their children at any one time.
- 20 community outreach services and 17 independent domestic, sexual and gender-based violence advocacy services, which specialise in supporting women through the criminal and civil justice systems.
- A network of culturally specific, multilingual services, including: refuges for women and children of Asian, African and Caribbean descent; an advocacy service for clients of Eastern European descent and community outreach services for clients of Vietnamese descent.
- Specialist services for victims of modern slavery, 'honour'-based violence and FGM.
- Child support workers, who provide emotional and practical support for children and their mothers across our services, as well as organising play and educational activities.
- The Freephone, 24-Hour National Domestic Violence Helpline, run in partnership between Refuge and Women's Aid, which receives an average of 236 calls per day.

3. Refuges are unique, life-saving services

Refuges are unique in the supported housing sector. Refuges are so much more than a bed for a night, they are a highly specialised, national network of safety and support services for women and children who are victims of domestic violence and other forms of gender based violence.

There is a continuing and urgent need for refuges. 1 in 4 women will experience domestic violence in their lifetime and two women a week are killed by their partners or former partners in England and Wales alone. Refuges are emergency, life-saving services for women and children. Data from Refuge's unique case management system, IMPACT, shows that last year over half of the women who came into our refuges had

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suffered a life-threatening injury and 44 per cent reported that the perpetrator had attacked them with weapons¹. On the point of entry into a refuge 64 per cent said the abuse was happening more frequently and getting worse². Further, women who use our refuges have higher levels of psychological distress and are more likely to express thoughts and plans about suicide than women who access our non-accommodation specialist services³. It cannot be overstated how critical refuge provision, and that of the expert staff who operate within refuge settings are, to ensuring the lives of women and children are both protected and rebuilt.

Behind the walls of our refuges, lives are transformed – specialist refuge workers support women and children who have experienced violence and trauma to keep safe, whilst rebuilding every aspect of their lives. This involves helping them to access health services, secure legal and immigration advice, navigate the criminal justice system and help them get back into work and education.

Refuges also provide vital peer support. Abused women and children are often extremely isolated by their perpetrators – cut off from friends and family and other forms of support. Women often tell us that before they came to a refuge they thought they were the only person experiencing domestic violence – and that they believed the abuse was their fault. Being in the refuge environment, speaking to other survivors, enables women to realise – often for the first time - that they are not alone, and that they are not to blame for the abuse.

Refuges are an essential element of the national response to violence against women and girls. It can be extremely difficult and dangerous to leave a violent and abusive perpetrator. Many of the women we work with attempt to leave several times before they are able to leave finally. It is well established that women and their children are most at risk of homicide at the point of separation and shortly after leaving an abuser. It is vital that women and their children are able to access a refuge space in a part of the country where they are safe as soon as they are able to leave the violent partner.

Due to the nature of domestic violence and other forms of gender based violence, and the very high risk many victims are under when they leave an abusive partner, refuges are, by and large, not accessed by women and children in the same local area where the abuse took place. Women and children often have to flee hundreds of miles to be safe from perpetrators, and many will have to move several times in order to be safe. Last year, 85 per cent of the women admitted into one of our refuges fled from a different local authority area.⁴ It is imperative that refuges are able to operate as a national resource for women and children to access no matter where their 'home' local authority is.

Specialist refuges are highly effective in keeping women and children safe and helping them rebuild their lives after domestic violence. At the point of leaving our refuges, 94 per cent of women reported feeling safer than when they arrived. 94 per cent said their quality of life had improved⁵. In order to achieve these aims, refuges inevitably require higher levels of security and staffing, and more specialised and intensive support than many forms of supported housing. The costs of refuges are therefore higher than other forms of accommodation. Nevertheless, refuges provide excellent value for money. A study by the New Economics Foundation (NEF) in 2016 found that Refuge's services represented 'extraordinary value'. The NEF found '[f]or every £1 invested in Refuge's specialist services, clients, their families and society at large receives an average social reward

¹ Refuge (2018) Data from IMPACT, Refuge's bespoke case management tool for those protecting women and children at risk

² Ibid

³ Ibid

⁴ Ibid

⁵ Ibid

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equivalent to £4.94...Refuge's safe accommodation – which provides holistic support for women and their children, as well as a safe roof over their heads – had the greatest impact of all of Refuge's services. 20% of the women used for this study were using the refuge service, yet refuges account for 54% of the total social return on investment.⁶

Refuge funding only accounts for a very small proportion of total funding within the supporting housing sector. It is estimated that refuges make up no more than 1% of supported accommodation. Yet they have a life-saving and transformational impact on the women and children that stay in them. It is therefore essential that funding for refuges is protected and that a sustainable funding model for refuges is devised, which enables the national network of life-saving services to grow.

4. Problems with the short-term supported housing funding model

The short-term supported accommodation funding model proposed is fundamentally unsuitable for refuges and is highly likely to lead to widespread refuge closures. If implemented, the lives of many women and children will be put at risk. **Refuge recommends strenuously that that a national sustainable funding system is developed for refuges.**

Refuges must be a national, not local, network

Refuge is concerned that the proposed system of funding is predicated on the approach that 'local authorities are best placed to understand and meet local needs, and to take a holistic view on both housing and support provision' when this is a wholly inappropriate model for refuges. As set out above it is crucial that refuges are viewed and are able to function as a national network. Whilst local authorities have an important role to play in the response to domestic violence, they should not be tasked with the responsibility of assessing the need for, commissioning and funding refuges in their entirety. If the national network of refuges is to survive, the funding system must be, at least in part, a national one.

Removes individual entitlement for housing support

Refuge strongly disagrees with the removal of a woman's entitlement to support with her housing costs when she needs to stay in a refuge. The current system based on individual entitlement to housing costs facilitates some, albeit limited, choice when it comes to accommodation for women fleeing domestic violence and gives women in refuges importance rights as tenants. Moving to a system which funds bed spaces in institutions, rather than the housing costs of individuals, is a backwards step which risks further restricting women's choices and limiting their rights.

The short-term supported housing funding model proposed removes individual entitlement to housing costs whilst placing no requirements on local authorities to commission any refuge beds. This is highly likely to reduce provision, exacerbating the postcode lottery of refuges and denying a refuge bed to women and children who need them.

Devolving a 'pot' of funding for short-term supported housing costs to local authorities, instead of allowing individuals to apply for support with their rent, means that housing costs for refuges are very likely to be spent according to local authority and local political priorities, which will not always align with women's needs and choices. Some of the forms of short-term supported housing, as defined in the consultation, are linked to the

⁶ New Economics Foundation (2016) Refuge: A Social Return on Investment Evaluation
<http://www.refuge.org.uk/files/Refuge-SROI-2016.pdf>

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statutory responsibilities of local authorities, such as the homelessness duty. Whereas others, including refuge provision, are not. It is inevitable under the proposed system, with no individual entitlement, that local authorities will prioritise spending and allocate space in a way that maximises their ability to discharge their statutory responsibilities. Victims of domestic violence and their children are highly likely to lose out under this model.

Removes the last stable form of refuge funding

Removing individual entitlement to housing costs removes the last stable form of refuge funding that now exists and would create significant uncertainty and instability in the sector. At present, refuges are mostly funded in two main ways: housing costs (building costs, rent, service charges etc.) are met by housing benefit; and support costs (support staff, specialist advice etc.) are generally funded by local authorities, subject to competitive tendering. Many refuge providers also independently fundraise to make up the shortfall between funding from statutory services and the full cost of providing a quality, specialist service.

Not all refuges receive local authority funding for support costs and rely entirely on either housing benefit payments alone or a combination of housing benefit and fundraised income. Refuge fears that should the proposed change be made these refuges will not be able to sustain themselves and will be forced to close.

Refuges which receive some funding for support costs by local authorities still heavily rely on the predictability and stability of rental income through housing benefit for mid-to-long term planning and sustainability considerations. At present local authority commissioning for support costs has created a short-term, unpredictable and continuously shrinking funding pot (see below for further detail on local authority commissioning) which cannot be relied upon when running and sustaining specialist services. It is therefore crucial that a future system for refuge funding involves a significant element of predictable, stable funding which allows a service to both survive and plan for the future.

Is a supply-led system

More refuges are desperately needed. The Council of Europe has long recommended at least one family place in a refuge per 10,000 of the population, yet this country has always fallen far short of this target. Research by Women's Aid has found that on any one day, around 94 women and 90 children are turned away from refuges⁷. The Government has signalled clearly its intention to expand the national network of refuges to better meet the needs of women and children fleeing domestic violence. The Violence Against Women and Girls (VAWG) Strategy aims that by 2020 'no victim is turned away from accessing critical support services delivered by refuges.'⁸

It is impossible that the aim for more refuges will be achieved under the proposed funding model. If the model is implemented in its current form the best case, though extremely unlikely, scenario is that the number of refuges remains the same. Whilst more detail is needed on how the 'pot' of funding to be devolved to local authorities will be sized, it is clear that this will be based on current housing benefit spend and therefore on the insufficient number of existing refuges.

⁷ Women's Aid (2017) SOS Save Refuges Save Lives <https://www.womensaid.org.uk/what-we-do/campaigning-and-influencing/campaign-with-us/sos/>

⁸HM Government (2016) Violence against Women and Girls Strategy 2016 - 2020 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/522166/VAWG_Strategy_FINAL_PUBLICATION_MASTER_vRB.PDF

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The proposed model is silent on how local authorities will be able to respond to further increases in demand for refuges and other forms of short-term supported accommodation. This is at a time when the Government's and civil society efforts are focused on reducing the social tolerance of domestic violence and encouraging victims to come forward to report abuse and seek help. If the stated intentions of the forthcoming Domestic Violence and Abuse Bill and the VAWG strategy are achieved, even in part, then the number of victims coming forward and therefore the demand on specialist services will grow significantly. A future refuge funding model must be designed to meet growing demand as more victims are encouraged to come forward.

Children

Refuge is concerned that the proposed funding model does not address children in refuges. Children are often the majority of residents in a refuge on any one day. For example, last year 664 women and 733 children stayed in one of our refuges⁹. The current funding system does not adequately address how the costs of children in refuges should be met and neither does the proposed model. Children coming into refuges are often highly traumatised and need significant specialist help and support to recover from the violence and abuse they have experienced or witnessed and settle in a new area. A funding system suitable for refuges must acknowledge the large numbers of children that live in a refuge and adequately fund their support and housing costs.

Local authority commissioning

Refuge is opposed strongly to a fully commissioned funding system for refuges. Currently, support costs for refuges are subject to commissioning via competitive tendering exercises by local authorities. Overall, this system has had a hugely negative impact on specialist services for women and girls.

As the largest provider of specialist VAWG services, Refuge has substantial experience in bidding for local authority support funding contracts and monitors and analyses all tenders for VAWG services across England and Wales. In Refuge's experience, local authority commissioners often have a poor understanding of VAWG and the needs of victims and commissioning is characterised by cost-cutting, the exclusion of non-local people and a preference for generic over specialist services.

Cost-cutting

Since funding for refuge support costs became the responsibility of local authorities and the initial ring-fence was removed, Refuge has had to endure huge cuts to the funding it receives for refuges. Since 2011 support funding for refuges we run has been cut by 31 per cent on average. In some areas this is much higher, with one London borough cutting refuge funding by 68 per cent and another local authority ending support funding for refuges altogether.

Refuge is very concerned that if the proposed funding model is implemented and housing costs are also devolved to local authorities, further significant reductions in costs will be demanded by commissioners. From our experience working with local commissioners, we think it is almost inevitable that providers which can offer the lowest housing costs will be commissioned, regardless of the quality of the service on offer. It is highly unlikely that many specialist refuge providers will be able to survive in this environment.

As highlighted above in section 1, the nature of refuges and the outcomes they generate mean that the housing and support costs are often more expensive than other forms of short-term supported accommodation. Robust

⁹ Refuge (2018) Data from IMPACT, Refuge's bespoke case management tool for those protecting women and children at risk

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security arrangements, the maintenance implications of a comparatively high turnover of women and children resident in refuges and the high levels of specialist housing management needed mean the housing costs of refuges are more expensive than a generic accommodation service. A sustainable funding model for refuges must take this into account and meet the justifiably higher housing costs of quality, specialist refuges.

Furthermore, it is of the utmost importance to Refuge that it is able to run refuges which are of sufficient quality to ensure a woman and her children feel safe and looked-after as soon as they arrive. When a woman walks into one of our refuges we want her to feel confident that she has made the right decision to leave her abuser. Refuge has had experience of taking over refuge contracts from generic providers and has needed to invest charity money to improve the quality of the building which often does not meet a standard which is fit for victims of violence and abuse. Refuge offers quality, specialist services which meet the needs of women and children and provides value, which means we will rarely be the cheapest provider. A fully locally commissioned funding model, with a fixed pot to fund many different accommodation needs does not provide any incentive to local authorities to commission quality, specialised services.

Localism

In Refuge's experience local authorities are, on the whole, poor at commissioning services for people without a local area connection, even when directed to do so under official guidance. For example, it is clearly set out under the National Statement of Expectations for VAWG and the accompanying commissioning toolkit that:

'Evidence shows that the majority of those accommodated in refuge will be from out of area - for many survivors fleeing domestic abuse, their immediate safety from harm will be dependent on access to a safe, secret space outside of the local authority where they are usually resident. Local refuges need to be linked into a national network of provision...limiting access to refuge based on locality compromises the ability of this national network to function effectively and provide support to all those who need it. Locality caps or restrictions should not be written into tenders.'¹⁰

Despite this clear direction from Government, in Refuge's experience local authorities are already demonstrating reluctance to commission services which are not primarily for local people. Refuge's development team frequently views tenders for refuge services which require a significant proportion of women and children to come from the local area. Other local authorities have stopped providing any funding for refuges on the grounds that they are not local services for local people. Last year 85% of women entering our refuges fled from a different local authority area¹¹, a wholly localised system is therefore fundamentally unworkable for refuges and highly likely to lead to refuge closures, which in turn will put lives at risk. Refuge is firmly of the view that a sustainable long-term funding system for refuges must be set within a national framework.

Generic over specialist

In recent years Refuge has seen local authority commissioners favour cheaper generic accommodation providers rather than specialist refuge providers. For example, it is increasingly common to see local authorities fund dispersed housing, instead of specialist refuge provision, with only limited floating domestic violence support

¹⁰ Home Office (2016) Violence Against Women and Girls: Services Supporting Local Commissioning https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/576238/VAWG_Commissioning_Toolkit.pdf, page 16

¹¹ Refuge (2018) Data from IMPACT, Refuge's bespoke case management tool for those protecting women and children at risk

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being available to abused women and children. This removes the choice a woman has of accessing a safe, secure, temporary place of refuge and denies her the opportunity to receive emotional and practical support from highly trained staff to help her to start to rebuild her life.

The commissioning of generic rather than specialist providers has led to services which fail to meet the needs the victims and demonstrates a misunderstanding of domestic violence. For example, some local authorities have commissioned generic providers to provide very short periods of emergency refuge accommodation (as little as one or two weeks) which is followed by moving women and children on to low support accommodation. This puts victims at risk and denies them the expert help and peer support they need to rebuild their lives.

The proposed funding model, with a single pot for a wide range of short-term supported accommodation, further incentivises generic 'one-size-fits-all' services for multiple groups at the expense of specialist, quality services which deliver more effective long term outcomes for survivors.

Threatens the independence of specialist organisations

Refuge is also concerned about the impact a fully local authority commissioned system would have on the independence of Refuge, and other specialist VAWG organisations. Refuge has developed expertise over decades and our specialist operational teams are constantly reviewing, evaluating and refining our services in order to provide the best response possible to victims and their children. We also have an important role to play in advocating for victims and campaigning to eliminate gender-based violence in all of its forms.

Funding via a women's entitlement to housing benefit ensures that, at least to an extent, Refuge and other providers have independence in how they operate services. We tailor our services to meet the needs of each individual woman and her children, and we work with them until they are ready to move on and an appropriate new home for them can be secured. We are concerned seriously that a system where a local authority provides all funding for a refuge, criteria and restrictions would be imposed around who can access a refuge and how long they are able to stay. Already, we find local authorities seeking to impose criteria, particularly local connection criteria to who can stay in a refuge. It is essential that the independence of the specialist VAWG sector is protected so that it can continue to provide and develop services to meet the needs of women and children.

5. An alternative funding model

For the reasons outlined above, the proposed short-term supported accommodation funding model is unworkable for refuges. **Refuge urges the Government to remove refuges from its model and work with Refuge and other specialist organisations to develop a specific model which will create a sustainable future for refuges – a national network of life-saving services.**

A sustainable funding model for refuges should meet the following minimum criteria:

- Fund refuges as a national network which women and their children can access regardless of where they live.
- Provide sufficient refuge spaces to meet demand and in so doing achieve the aim that 'no woman is turned away.' This must include funding solutions for women whose immigration status means that they have no recourse to public funds.
- Meet housing and support costs for women and children in quality, specialist refuges.
- Provide stable, predictable funding levels which enable providers to plan and invest in services and plan for the future.

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For more information on any of the points above, please contact Ellie Butt, Senior Policy and Public Affairs Manager, on 0207 395 7776 or eleanor_butt@refuge.org.uk