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**Cymorth i Ferched Cymru**  
**Welsh Women's Aid**

Rhoi Merched a Phlant yn Gyntaf  
 Putting Women & Children First

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<b>These are the views of:</b>	<i>Welsh Women's Aid (Third Sector) - the national charity in Wales working to end domestic abuse and all forms of violence against women.</i>

### About Welsh Women's Aid:

Welsh Women's Aid is the umbrella organisation in Wales that supports and provides national representation for independent third sector violence against women, domestic abuse, and sexual violence (VAWDASV) specialist services in Wales. Our membership comprises of 20 specialist support services. These services deliver lifesaving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence against children and young people, men and boys, trans and non-binary people, as part of a network of UK provision. As an umbrella organisation, our primary purpose is to prevent domestic abuse, sexual violence, and all forms of violence against women and ensure high quality services for survivors that are needs-led, gender responsive and holistic. We collaborate nationally to integrate and improve community responses and practice in Wales. We also award the Wales National Quality Service Standards (NQSS), a national accreditation framework for domestic abuse specialist services in Wales (supported by the Welsh Government) as part of a UK suite of integrated accreditation systems and frameworks. (More information on the NQSS can be found [here](#)).

There are a myriad of obstacles that survivors of VAWDASV face when trying to access housing in the current climate. Following the Covid-19 pandemic, years of austerity, a shortage of housing and now the cost-of-living crisis, finding adequate housing has become- far from a given and fundamental right- an extraordinary challenge to find and to maintain. While barriers to housing are society-wide, for those experiencing violence against women, domestic abuse and sexual violence, for those women who are fleeing violence and abuse, and for those seeking to rebuild their life following this trauma, these barriers are further exacerbated.

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Welsh Women's Aid is a registered charity in England and Wales, No. 1140962  
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The fear of leaving a home and residing somewhere that is or has the potential to also be unsafe is often a reason why survivors remain in a home where abuse or violence is being perpetrated. This has been compounded during the housing and cost-of-living crisis with the difficulty of finding somewhere to live at all greatly increasing. As highlighted in our previous Cross Party Housing Group Briefing<sup>1</sup>, the intersection between housing and VAWDASV cannot be underestimated. Abuse often takes place in the home, a place where everybody should feel safest. Those who flee abuse and/or violence require a safe, appropriate environment to process their trauma and to live a life without fear. Wales is in the midst of a housing crisis, where there is not enough suitable accommodation for the people who need it. When a survivor makes the decision to leave an abusive or violent situation, they may enter temporary emergency refuge provision. Refuge provision is only ever intended to be short term, however in the last year specialist services have had 252 survivors who have stayed in refuge over six months. The most common reason given is due to the lack of move on accommodation. Residing in refuge offers lifesaving safety, however it is not a permanent housing solution. Refuge provision usually does not allow for visitors to ensure the safety of its residents, and there are often curfews. Refuge should never be considered a “home”, as survivors enter refuge because they are fleeing imminent risk of harm and nothing else. Seeking permanent shelter can be a long and arduous process for any individual<sup>2</sup>, whilst being a survivor adds further obstacles. The Right to Adequate Housing needs to ensure that there is enough adequate housing which is accessible to those who need it. Whilst the implementation of The Renting Homes (Wales) Act 2016, seeks to implement security of tenure for those residing in social and private housing, we fundamentally believe that this does not work for all refuge provisions. This is due the secure nature of the Act which does not fit the provision of temporary emergency refuge accommodation.

With there being shortages of permanent accommodation, Welsh Government in their Ending Homelessness in Wales Action Plan have stated that they intend to focus on prevention and a rapid housing model<sup>3</sup>. They further state that all services should work in a trauma informed way. In order for The Right to Adequate Housing to be successful in practice, WWA believe that there needs to be a cross-sector awareness and understanding at all levels, whether this is Welsh Government, local authorities and housing providers, of the difficulties that survivors face in the housing system and the impact domestic abuse and forms of violence can have.

Housing options for survivors after or instead of refuge or other forms of temporary accommodation are social housing, private landlords or home ownership. There are often many different barriers in the way of survivors when they try and navigate the housing system. Since the Live Fear Free Helpline started to record financial abuse in April 2022, there have been 577 records. During 2021/2022, 38%

<sup>1</sup> <https://welshomensaid.org.uk/wp-content/uploads/2021/11/Cross-Party-Groups-on-Housing-and-on-Violence-against-Women-and-Children-on-housing-and-sexual-violence.pdf>

<sup>2</sup> [https://www.solacewomensaid.org/sites/default/files/2019-10/Solace\\_SafeasHousesReport\\_FINAL\\_0.pdf](https://www.solacewomensaid.org/sites/default/files/2019-10/Solace_SafeasHousesReport_FINAL_0.pdf)

<sup>3</sup> [https://www.gov.wales/sites/default/files/publications/2021-11/ending-homelessness-high-level-action-plan-2021-2026\\_0.pdf](https://www.gov.wales/sites/default/files/publications/2021-11/ending-homelessness-high-level-action-plan-2021-2026_0.pdf)

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of survivors accessing refuge stated that they have experienced financial abuse. Financial abuse is a type of coercive control where the perpetrator limits the control the survivor has over their finances. This could mean the survivor does not have access to their own funds, has never been able to pay bills or does not have any funds to support themselves when fleeing. As financial abuse is a form of coercive control- which by its' insidious nature can be hard to define- it is likely that the actual percentage of survivors who have experienced financial abuse is much higher than those who have explicitly identified it. Financial stability after abuse can be extremely hard to achieve and maintain and will likely impact a survivor when they move on to new accommodation, for example it may be extremely difficult to navigate bills and may accrue debt. This could escalate to evictions and may have restrictions around renting future properties, instead of being provided the support they require. Survivors of financial abuse and/or other forms of abuse and violence will face a multitude of barriers to secure suitable and safe accommodation. They may not be deemed a "desirable candidate" for private landlords due to their financial situation or their association with a perpetrator, in a market which is already grossly competitive. In a recently published toolkit, Surviving Economic Abuse highlighted that 42% of landlords refused to let properties to those on housing benefits<sup>4</sup>. Private rental properties also often require proof of earnings and a deposit up front. There are many different reasons why a survivor may not have the funds for this, due to financial hardship, and therefore would be unlikely to be able to secure a private rental property. This disadvantages those survivors who are not financially stable and creates inequality between survivors depending on their financial situation. To echo our points above, all of these factors could contribute to a survivor feeling forced to continue to reside with their perpetrator.

Being unable to secure tenancies due to receiving housing benefits or due to financial difficulties may lead to survivors of VAWDASV being sexually exploited. The All Wales Operational Group on Sexually Exploited Women, held by WWA, highlighted that adults who are sexually exploited are coerced, forced or manipulated into engaging in sexual activities by a third party or out of necessity to finance basic needs. This includes sex for rent arrangements, where an individual offers accommodation at a reduced rate or for free, in exchange for sexual acts<sup>5</sup>. Some survivors may feel that this is the only option to secure accommodation, however this leaves individuals vulnerable to further abuse and violence. A 2022 briefing further highlighted that out of 101 women who had sold or exchanged sex or images, 63 had been homeless at some point in their life<sup>6</sup>. The barriers that survivors face when trying to access to suitable and safe accommodation can hinder their process of taking control of their own lives and living without fear.

<sup>4</sup> [https://www.dahalliance.org.uk/media/10649/3\\_-wha-economic-abuse.pdf](https://www.dahalliance.org.uk/media/10649/3_-wha-economic-abuse.pdf)

<sup>5</sup> [https://d3n8a8pro7vnm.cloudfront.net/npto/pages/7648/attachments/original/1636731376/Briefing\\_PCSC\\_Bill\\_Amendments\\_292A\\_292B\\_Nov\\_21.pdf?1636731376](https://d3n8a8pro7vnm.cloudfront.net/npto/pages/7648/attachments/original/1636731376/Briefing_PCSC_Bill_Amendments_292A_292B_Nov_21.pdf?1636731376)

<sup>6</sup> [https://www.encompassnetwork.info/uploads/1/4/2/8/142838553/encompass\\_snapshot\\_2022.pdf](https://www.encompassnetwork.info/uploads/1/4/2/8/142838553/encompass_snapshot_2022.pdf)

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Further to this, rental properties often do not allow residents to have pets and many refugees do not either. Dogs Trust have highlighted that 9 out of 10 professionals<sup>7</sup> have stated that some survivors will not leave home without knowing that their pet would be safe. Due to the lack of accommodation that allows pets, many survivors may decide to continue to reside in the home where they are at risk of abuse and violence. This puts survivors in a difficult position when wanting to flee to safety but also want to remain with their beloved pet, who are often are support mechanisms.

WWA believe that it is crucial that the legislation to implement The Right to Adequate Housing allows for an understanding of the multiple disadvantages and intersectionality's that individuals face. It should additionally ensure that the implementation does not leave survivors vulnerable to further abuse or violence. We believe that consultation with specialist services in VAWDASV should be at the forefront of any decision made on The Right to Adequate Housing, to ensure the barriers for survivors are removed and that the system supports survivors, in implementation and practice. We profoundly believe that to create a housing system that supports survivors of VAWDASV and removes barriers, there needs to be a focus on equity and what this means to different marginalised groups.

To demonstrate this point; annual private rental prices increased by 3.2% by October 2022<sup>8</sup> in Wales and utility bills are due to be raised further in April 2023<sup>9</sup>. Women and minoritised groups are significantly and disproportionately impacted by the current socio-economic crisis. For example; women are more likely to have caring responsibilities and those that have such responsibilities are unlikely to be able to increase their hours at work. It has been noted that women who are single parents are more likely to have less savings<sup>10</sup>. Those who are from Bangladeshi, Pakistani and Black ethnic groups are more likely to be disproportionately impacted by the cost-of-living crisis, as rates of poverty are significantly higher within these groups who face multiple societal barriers.<sup>11</sup> Women who reside in poverty and have multiple unmet needs are considered to be at greater risk of intimate partner violence<sup>12</sup>. It was estimated in 2021-2022 that 11,704 households were assessed as being homeless and were owed a duty to help to secure accommodation by the local authority<sup>13</sup>, however, this figure is likely to be much higher in actuality due to those who are hidden homeless. These are individuals who do not present to the local authority, are residing with family or are sofa surfing.

To understand how The Right to Adequate Housing would work in practice and the potential challenges and barriers, it is essential to highlight the areas where we believe the current housing system is failing survivors on multiple levels. During the Back the Bill campaign, the right to adequate

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<sup>7</sup> Pets and Domestic Abuse Survey 2019 - News and updates - Dogs Trust Freedom Project

<sup>8</sup><https://www.ons.gov.uk/economy/inflationandpriceindices/bulletins/indexofprivatehousingrentalprices/october2022>

<sup>9</sup> <https://researchbriefings.files.parliament.uk/documents/CBP-9491/CBP-9491.pdf>

<sup>10</sup> <https://wbg.org.uk/wp-content/uploads/2022/03/The-gendered-impact-of-the-cost-of-living-crisis.pdf>

<sup>11</sup> Ibid.

<sup>12</sup> [https://www.agendaalliance.org/documents/138/Underexamined\\_and\\_Underreported\\_Briefing.pdf](https://www.agendaalliance.org/documents/138/Underexamined_and_Underreported_Briefing.pdf)

<sup>13</sup> <https://www.gov.wales/homelessness-accommodation-provision-and-rough-sleeping-november-2022>

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housing was summarised as “everyone has the right to live somewhere in security, peace, and dignity”<sup>14</sup>. For this to be achieved, WWA believe that there needs to be affordable, habitable, accessible, and appropriate housing for survivors of VAWDASV, to ensure they are able to recover and rebuild their lives in a safe and secure environment.

WWA coordinates a sexual exploitation workers forum, for workers on the front line. In a recent forum, it was identified that the homelessness assessment that was being conducted for many survivors with complex needs and those who had been exploited, was not appropriately trauma informed. It was highlighted that the homelessness assessment did not take into consideration multiple disadvantages or the different needs of survivors. There is currently often a need for the local authority to get into contact with a survivor, without accounting for the fact that some individuals may live a transient lifestyle or may not have access to a phone. There is a lack of a strength-based, person-centred approach in situations where those who are sexually exploited are not understood, and this is marked against them when they miss appointments or are difficult to get into contact with. They are therefore labelled and stigmatised as unreliable and unwilling to engage. Shelter conducted some research into the current housing and homelessness system and further highlighted that individuals felt that they were re-living traumatic events, and that there was often an expectation that they would have official documentation with them<sup>15</sup>. The expectation that individuals will carry official documents with them does not, for example, account for the circumstances of VAWDASV survivors who have had to flee imminent risk of serious harm. This highlights the lack of understanding by some conducting the assessments, both of the unsuitability of their requests and of the lasting retraumatizing impact.

It is crucial that the homelessness application and assessment does not re-traumatise or further traumatise survivors. To successfully implement The Right to Adequate Housing, staff who are completing homeless applications must fully appreciate the range of different situations and circumstances that lead to people being homeless or at risk of homelessness. WWA strongly believe there must be a trauma informed, strengths based and needs-led approach to the assessment process, to ensure that survivors are kept safe and are correctly supported to obtain permanent housing. It is essential that the specific needs of the survivor is identified, so that the local authority staff can work with them and prevent any further barriers to obtaining adequate housing. This specific acknowledgement of the reasons why survivors present as homeless, would help raise awareness of VAWDASV throughout Welsh Housing Policy. However, awareness of VAWDASV is not enough, there needs to be commitment to ensure The Right to Adequate Housing works for survivors of VAWDASV in practise.

<sup>14</sup> <https://www.taipawb.org/wp-content/uploads/2022/10/Right-to-adequate-housing-5-things.pdf>

<sup>15</sup> <https://sheltercymru.org.uk/wp-content/uploads/2023/02/Trapped-on-the-Streets-Full-Report.pdf>

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The Housing First model is a unique approach to tackle homelessness which focuses on long term, affordable accommodation. This accommodation should be provided as quickly as possible, followed by support to help ensure the individual can maintain their tenancy<sup>16</sup>. The Housing First Model is grounded on principles such as; housing is a human right, there is active engagement without coercion and service users should have choice and control<sup>17</sup>. Housing is achieved in the first instance and any support needs are met afterwards. The current housing system and housing assessment system does not allow for survivors to have choice or control. As previously stated, many survivors find the housing system difficult to navigate due to financial concerns, the lack of safe, secure, and appropriate permanent accommodation and being re-traumatised or further traumatised by the system. The incorporation of The Right to Adequate Housing needs to be underpinned by the premise and understanding that housing is a human right, and it is key for survivors to thrive and to be subsequently supported. It is difficult for survivors to access stable and consistent support when their housing situation is temporary or transient. Everything needs to be done to remove the barriers and discrimination in housing experienced by survivors of VAWDASV. Under the Well-being of Future Generations (Wales) Act 2015<sup>18</sup>, Welsh Ministers must think about the long-term impact of their decisions and look to prevent problems. Implementation of The Right to Adequate Housing, if done correctly, would allow Ministers to ensure the needs of the present survivors are met, without compromising the ability of those survivors in the future to meet their own needs. The Right to Adequate Housing is also an international right under Article 11(1) of the International Covenant on Economic, Social and Cultural Rights<sup>19</sup>. The implementation of The Right to Adequate Housing into Welsh law will demonstrate a commitment to this.

WWA also believe that there needs to be a specific focus and understanding on the impact that insecure housing has on children and young people. Children who may have witnessed, experienced, or lived with domestic abuse or other forms of violence, and are to be deemed survivors in their own right. As highlighted in a 'A Duty to Support'<sup>20</sup>, there is a postcode lottery of service provision for children and young people who require specialist support. Shelter have highlighted that families who rent are 9 times more likely to have moved in the last year than families who own their homes<sup>21</sup>. In rental properties, there are often concerns about the increasing rental prices, poor living conditions or being able to pay rent more generally. Children are already facing a lottery of access to specialist support, and the increased likelihood of having to move homes allows children to fall through the gaps of services due to a lack of continuity of support.

<sup>16</sup> <https://www.cymorthcymru.org.uk/en/policy/housing-first/>

<sup>17</sup> <https://www.gov.wales/sites/default/files/publications/2019-03/housing-first-principles-guidance-for-local-authorities.pdf>

<sup>18</sup> <https://www.futuregenerations.wales/wp-content/uploads/2017/01/WFGAct-English.pdf>

<sup>19</sup> <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-economic-social-and-cultural-rights>

<sup>20</sup> <https://welshwomensaid.org.uk/wp-content/uploads/2022/06/CYP-FOI-Report-ENG-WWA.pdf>

<sup>21</sup> [https://assets.ctfassets.net/6sxvmdnnpn0s/77ViBSpWpGzZdUcsXu77of/f7b8b461208d6207d87f4295aefd112d/Growing\\_up\\_renting.pdf](https://assets.ctfassets.net/6sxvmdnnpn0s/77ViBSpWpGzZdUcsXu77of/f7b8b461208d6207d87f4295aefd112d/Growing_up_renting.pdf)

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As highlighted in the Gender Based Violence, The Needs of Migrant Women report by the Equality and Social Justice Committee<sup>22</sup>, those with no recourse to public funds (NRPF) face significant obstacles when it comes to housing. When individuals experiencing NRPF are housed, they are likely to be in accommodation that is of poor condition or in an area with no support network. During 2021/22, 24 survivors without recourse were supported by refuge and only 36% of specialist services in Wales are able to accept women with NRPF. Many specialist services often find themselves housing women with NRPF in refuge, by using money from reserves, which is not financially viable for the service. Although state benefits are reserved for Westminster, housing is devolved to Wales. We welcome Welsh Governments acceptance of the committee's recommendation of the establishment of a crisis fund, however the finite detail of this is still to be confirmed. The implementation of The Right to Adequate Housing fundamentally cannot exempt those with NRPF, and there needs to be clear guidance on how the fund will support survivors with NRPF to ensure access to adequate housing.

We believe that The Right to Adequate Housing would only work in practice if it considered that every individual has an undisputed right to adequate housing; and the importance of security and consistent housing for survivors of VAWDASV is meaningfully incorporated. The challenges to the application of this policy would lie in a lack of understanding of how inadequate housing affects survivors and how it further burdens those who have multiple disadvantages. To overcome these barriers and challenges, we believe that Welsh Government should consult fully with the VAWDASV sector, including specific contact with by- and-for organisations, to ensure that The Right to Adequate Housing meets the needs of survivors. All individuals who work within housing, whether at a Welsh Government or local authority level must be provided with regular VAWDASV training, to ensure they understand different forms of abuse/violence and the multitude of situations where a survivor may present as homeless or will require a new home. Further to this, specific training should be provided to ensure that those within housing understand multiple disadvantages and the difficulties marginalised groups face, to ensure systematic barriers are broken down. The policy needs to be trauma informed, strengths based and person- led, and this needs to be enshrined right throughout the housing sector, in the homelessness assessment and in implementation by social and private rental landlords. We are aware that The Right to Adequate Housing will be a progressive policy, but it must be ensured that all resources are used in order to achieve this long-term policy aim and that there is further clarity on the fund for survivors with NRPF.

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<sup>22</sup> <https://senedd.wales/media/zh5helfw/cr-ld15422-e.pdf>

