

Scottish Women's Aid submission to the INQUIRY INTO SUPPORTED HOUSING FUNDING REFORM set up by the Communities and Local Government Select Committee and the Work and Pensions Select Committee. February 2017

1. Scottish Women's Aid

Scottish Women's Aid (SWA) is the lead organisation in Scotland working towards the prevention of domestic abuse and plays a vital role in campaigning and lobbying for effective responses to domestic abuse.

Our Women's Aid network of 36 members, working across Scotland from Shetland to the Borders, provide 487 refuge spaces for women and children experiencing domestic abuse.¹ Women's Aid groups do not own the properties used to provide refuges; they are leased from local authorities and housing associations. Rent for refuges are met in full by housing benefit, subject to the individual claimant's eligibility. Women's Aid groups are dependent on payment of housing benefit to cover the rent of leasing accommodation from local authorities or housing associations.

The quality of accommodation and support services is tightly regulated in Scotland. Women's Aid services are registered and inspected by the Care Inspectorate, have a range of outcome agreements with funders and commissioners of these services and work towards Scottish Women's Aid National Service Standards. Refuge rent and service charges eligible for housing benefit are determined by local authority housing benefit departments.

Our research on the impact of the LHA cap on refuges in Scotland found that Women's Aid groups face cuts of £3.7 million annually in housing benefit that will result in the widespread closure of the refuges that accommodate hundreds of women and children each year.²

Existing provision for refuge accommodation continues to outstrip supply, SWA's annual Census Day survey found that 46% of women and their children needing refuge were unable to be accommodated due to lack of safe or suitable space.³

2. Refuges - funding model criteria

Refuges make up less than 2% of supported accommodation. As direct access safe housing for women and their children, often at a point of crisis it has never fitted comfortably within the past and existing funding models for supported housing. This is an opportunity to develop a long term sustainable solution.

¹ Refuge space is defined as the accommodation that a woman or a woman and her children occupy, whether that is self-contained or in a shared property.

² Scottish Women's Aid (2016) Capping social housing rents: the impact on Refuges in Scotland

³ Scottish Women's Aid Census Day Survey (2016)

SWA believes a funding model for refuges needs to ensure that all women and children experiencing domestic abuse and require refuge accommodation are able to access it at the point of need. This would include women with NRPF, or insecure immigration status, in accordance with Article 4 of the Istanbul Convention, as well as women who are working or are students.

The criteria for funding should ensure that children's needs and rights are fully recognised. Children make up the majority of residents in refuges and specific facilities such as play rooms, equipment and safe outdoor play facilities need to be provided, maintained and replaced.

The Care Inspectorate in Scotland provides a robust quality assurance framework; we recommend that registration with the Care Inspectorate is a key condition for a new funding model.

3. Whether separate funding models are needed for refuges and other short-term supported services?

Following consultation with our members, SWA believes a specific funding model is required for refuges in order to provide security and sustainability for Women's Aid services and ensure safe, accessible refuge accommodation for women and children at the point of need.

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The proposed model for refuges and other 'short term accommodation' is being developed in response to the inflexibility of Universal Credit (UC) which is calculated and paid out on a monthly system of assessment and payment. This fails to work for refuges where women and children may stay for less than a month and Women's Aid services will not be able to recover rent payments where someone has moved out prior to the payment being made. This would make these services unsustainable.

Our members have concerns that a new funding model is being developed within unrealistic timescales, that it is a response to this unforeseen consequence of UC; rather than from a starting point of what would a sustainable funding mechanism for refuges look like.

The definition of 'short term' supported accommodation appears broad and generic and will lead to greater competition for funding within a pot that currently does not meet existing needs.

A new model should not place any restrictions on lengths of stay as this varies according to individual support needs and in women being able to access to appropriate accommodation to move onto. For women and children who have experienced domestic

abuse additional factors such as legal action against a perpetrator or the need to move to another area for safety reasons can affect their length of stay in refuge.

4. How the localised funding pot for supported housing would work, including:

- how it will be ring-fenced
- which factors should be used to determine local allocations

SWA recommends that funding is devolved to the Scottish Government. Scotland has its own Violence against Women and Girls Strategy, domestic abuse and homeless legislation. It's important that the devolved nations are able to plan service provision to meet their strategic aims and international treaty obligations.

It is vital that funding is ring-fenced to provide long term stability. Our members have serious concerns about how ring fencing will be maintained in the longer term. Particularly if funding is devolved to local authorities to allocate as they are also direct support and accommodation service providers working within difficult financial constraints.

We have set out above some of the factors that should be used to determine allocation and SWA would want to work with the Scottish Government and other key partners to develop this further.

A sustainable long term programme of funding for a minimum 3 year period would provide improved financial security, allow for more effective business planning and governance as well as reducing the administrative burden on services.

5. The effects of uncertainty about the new funding model on tenants and development in the supported housing sector.

SWA's annual Census Day survey found that 46% of women and their children needing refuge were unable to be accommodated due to lack of safe or suitable space.⁴

Funding of the housing element for supported housing has been under review since 2011. This has had an impact on the provision of new supported housing developments.

Women's Aid groups in Scotland have seen planned developments for additional refuge accommodation halted as a result for the ongoing uncertainty over funding. This has delayed the refurbishment of older refuges, with almost 40% of refuges still communal requiring women and children to share kitchen, living and in some cases bathroom facilities with people who are not members of their own family.

⁴ Scottish Women's Aid Census Day Survey (2016)

6. Whether the new system should be piloted before its full implementation.

We would recommend that any new system is piloted prior to full implementation, it is important that a credible funding system is developed. Piloting would allow for robust testing and learning and necessary revisions to be implemented, saving a range of costs before fully investing in a new scheme. More importantly it would ensure that both women and children and service providers face less disruption. Pilots would allow for better planning for transition and more accurate financial assessment of administrative costs for managing a new system.

This would mean revisiting proposed timescales for implementation and would have the advantage of allowing for the issues arising from the roll out of UC to be dealt with first and avoid any further unforeseen circumstances.

7. Whether the new system will resolve the shortfall in supported housing placements over the long term.

A new system will not resolve the current shortfall in refuge provision. The Government has stated that a new funding model will ensure that supported housing continues to be funded at the same level it would have been in 2019/20. This does not allow for increases in rent charged by landlords that are passed onto service providers, or for inflationary increases in service charges, for example in energy costs. For example one Women's Aid group has had the rent increased by 5% for their refuge, by the housing association landlord but their local authority housing benefit section has refused to pay this increase.

Existing refuge provision is currently inadequate to meet the needs of women and children. For example, our annual Census Day research found that; 46% of women and their children who requested refuge were turned away due to a lack of safe and suitable spaces.⁵ The UK fails to meet the Istanbul Convention recommended ratio of one refuge bed per 10,000 inhabitants.⁶

8. Whether the new system will ensure that the varied rate of the LHA cap will not adversely affect tenants and providers in low-value parts of the country.

It is unclear from the consultation proposal what relationship, if any, the LHA cap will have to short term accommodation. It is clear that variations in the rate of the LHA cap do not relate to the additional costs of providing refuges which are, in the main, not locally determined but relate to the cost of specialist provision. This includes the additional cost of providing, equipping, maintaining, heating and insuring play rooms, counselling and interview rooms for therapeutic work with women and children, office space for staff and additional safety and security measures. Refuges are fully furnished and equipped as women and children often access refuge with no possessions. As direct access crisis

⁵ Scottish Women's Aid (2016) Census Day

⁶ <http://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/210>

accommodation, designed to meet the special vulnerabilities of women and children who have experienced domestic abuse, they require higher levels of intensive housing management.

Lower value LHA areas in Scotland tend to be more rural and remote – the very areas which have higher than average costs for refuges related to more expensive building, transport, fuel and heating costs. For example the LHA rate for a 2 bed property in the Scottish Borders is £92.05 and in the Highlands and Islands £110.72. While in Lothian the LHA rate for a 2 bed is £145.43, a difference of £34.71 to £53.38 per week. This would result in refuges in lower value areas having much less of their rental cost met through the Universal Credit element of the model and greater dependency on some form of ‘top up’ funding. As it is unclear how the ‘top up’ fund will be devolved, managed, allocated and ring fenced in future this creates further disadvantages for Women’s Aid services working in more rural and remote areas.

9. Whether housing benefit acts as a disincentive to work

SWA does not believe that housing benefit acts as a disincentive to work. Women’s inequality means that they are twice as dependent on social security as men, with 20% of women’s income coming from the benefits and tax credit system, compared with 10% of men’s.⁷ The gender pay gap in Scotland is 14.8%. Women working part-time earn 33.5% less than men working full-time, and women are 75% of the part-time workforce. On average women earn £175.30 less per week than men⁸ Housing benefit is a necessity for many working women - because they are in low paid work.

Of much greater concern is that many women and children experiencing domestic abuse are unable to access refuge accommodation because of their lack of entitlement to housing benefit. Women with insecure immigration status, or with NRPF, many EEA migrants and students are ineligible for housing benefit. Their only options are to remain with an abusive partner or homelessness and destitution⁹.

A specific refuge funding model, based on the provision of refuge spaces to meet women and children’s needs - rather than being based on their entitlement to housing benefit would mean all women and children experiencing domestic abuse would be able to access safe accommodation and support.

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⁷ The Fawcett Society (2006) Who benefits? A gender analysis of the UK benefits and tax credit system

⁸ Close the Gap (2016) Gender pay gap statistics

⁹ Engender (2016) Securing Women’s Futures