

# Consultation Response Safety and justice

From the Shelter policy library

June 2003

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# Shelter

Shelter is a national campaigning charity that every year works with over 100,000 people. Shelter has two aims: one is to prevent and alleviate homelessness by providing information, expert advice and advocacy for people with housing problems; our second aim is to campaign for lasting improvements to housing-related legislation, policy and practice. Our services include:

- A national network of over 50 housing aid centres
- Shelterline - our free, national, 24-hour housing advice service, which has recently received the Telephone Helplines Association Quality Mark
- Shelnernet - our free, online, housing advice website
- The government-funded National Homelessness Advice Service, which provides specialist housing advice, training, consultancy, referral and information to other voluntary agencies, such as Citizens Advice Bureaux and members of Advice UK, which are approached by people seeking housing advice
- A number of specialist projects promoting innovative solutions to particular homelessness and housing problems. Shelter currently has four 'Homeless to Home' schemes, designed to help formerly homeless families sustain a tenancy and live successfully in the community.

Shelter welcomes the opportunity to respond to Safety and Justice. Domestic violence is increasingly recognised as a major cause of homelessness. The Homelessness Directorate has recently highlighted relationship breakdown as one of the top three causes of homelessness and therefore requiring particular action from local authorities. There is also increasing recognition from government of the link between domestic violence and repeat homelessness.<sup>1</sup>

Recent government statistics show that 22 per cent (almost 28,000) of homeless households lost their home following relationship breakdown - an increase of over 7% on corresponding figures for 2002. Of these, 70% of these were due to violent relationship breakdown - the main cause of the increased figures.<sup>2</sup> Shelter's own figures also reveal that relationship breakdown is a key cause of homelessness. Last year, Shelter helped 6,782 people with housing problems linked to relationship breakdown 3,078 of whom cited domestic violence as a contributory factor. Figures from three of Shelter's Homeless to Home projects indicate that the largest single group they assist is people fleeing domestic violence and that these people make up 38% of all their service users.<sup>3</sup>

Finding legal remedies to the problem of domestic violence is one part of the picture. However, preventative services and support to victims also need to be provided if homelessness is to be prevented in future. Safety and Justice is an opportunity to develop

a strategy that includes all of these elements and thus bring greater protection for victims of domestic violence and their families.

Shelter's response to Safety and Justice focuses on three areas of the document in which we consider the organisation to have the greatest level of experience and expertise.

These areas are:

- Implementation of homelessness legislation
- The effectiveness of current legislation and guidance in providing a safety net for vulnerable people leaving home due to domestic violence
- The effectiveness of policy, safety and support services in enabling victims to stay in their homes, or use emergency accommodation.

In response to these areas for consultation, we wish to make the following recommendations:

- There needs to be further research and monitoring on implementation of the Homelessness Act 2002, to examine how increased awareness about domestic violence issues gained through the homelessness review and strategy process translates into better services for victims and their families.
- Registered social landlords should be encouraged to sign up to arrangements with the local authority and other voluntary sector providers that aim to co-ordinate policy and practice around domestic violence.
- Data collection methods by local authorities need to be improved. In the short term, the P1E form needs to be amended to show secondary causes of homelessness; in the longer-term this needs to be supplemented by a case-by-case recording system.
- The Priority Need Order in England in relation to vulnerability needs to be amended. The Welsh Priority Need Order - giving automatic priority need to people fleeing domestic violence - should be adopted. This will reduce current inconsistencies in local authority practice and increase the support given to victims of domestic violence.
- The proposals in the Green Paper, 'Every Child Matters' should be used as an opportunity to develop a more stable planning and funding base for services to children in households experiencing domestic violence.
- The current government proposal to enforce minimum standards in temporary accommodation should also include the requirement that local authorities make arrangements for support services to be put in place and that the temporary accommodation offered is suitable for an applicant and their family, based on an assessment of their support needs.

- The Homelessness Directorate should follow the example set out in the Supporting People programme and consider the appointment of a dedicated worker to monitor local authority homelessness strategies and develop cross-authority initiatives.

### **How effectively is current homelessness legislation being implemented (including good practice)?**

Shelter agrees with the position taken in Safety and Justice that the Homelessness Act has an important role to play in developing partnerships and the provision of support to victims of domestic violence. The new duty on local authorities to formulate homelessness strategies is an ideal opportunity to address the long-standing problem of individual departments/agencies failing to view domestic violence as a major part of their work and thus not affording it sufficient attention and funding. Many victims of domestic violence have a range of housing, health and education needs. Working strategically across local authority departments and services is more likely to effectively address these needs and provide the type of support that will prevent this group of people from becoming homeless in future.

Gloucestershire County Council has set up a Homelessness Act implementation group to co-ordinate implementation at county level. This group includes all six district councils, representation from social services and Shelter. The group has agreed to produce joint protocols for various groups of homeless people, including people experiencing domestic violence. The protocols are procedures for front-line staff and are intended to help address previous inconsistencies in practice and ensure that more effective procedures are in place.

Since August 2002, Shelter has been conducting research into the implementation of the Homelessness Act, based on a sample of 28 local housing authorities throughout England. Shelter's research indicates that local authorities are gaining a better understanding of the complexity of local homelessness issues through undertaking the review and strategy process. In the context of domestic violence, they are using this knowledge to identify gaps in the services they currently provide to this group of people.

### **Areas identified by local authorities as needing further development**

Local housing authorities have identified 2 major areas in particular - housing aid and advice and support services - that need to be improved. In some cases, local housing authorities are also planning to redesign their existing services to meet the changing demands and needs of people experiencing domestic violence.<sup>4</sup>

**Advice services:**

- Better publicity of services
- Specialist advice provision, for groups such as lesbians and gay men
- Advice on security measures and retaining rights to re-enter the home

**Support services:**

- Refuges/safe houses
- Outreach services
- Floating support
- Security measures.

These are encouraging signs. However, implementation of the Homelessness Act is still in its early stages; further research and monitoring is required to get a longer term of view of how homelessness reviews and strategies translate into better services for people experiencing domestic violence.

The complex nature of domestic violence means that effective implementation of the Homelessness Act will also depend on how well local authorities utilise existing forums and frameworks that relate to domestic violence issues. Virtually all local authorities have a domestic violence forum covering their area.<sup>5</sup> These bring together local authority departments, such as housing, social services and education, alongside the police, probation, health and refuge providers. These can be both a source of considerable expertise on domestic violence issues and make important links with other local plans and strategies. Since the passing of the Crime and Disorder Act (1998), local authorities have also been required to form partnerships to audit the profile of domestic violence in the local area and develop strategies as a result of these. They are also strongly encouraged through s 17 of this Act to have in place a clear policy on domestic violence that is understood and complied with by its entire staff. This should include a framework of 'co-ordinated and measurable responses' to the issue by all key departments, including housing and social services.<sup>6</sup>

The Greater London Authority's Domestic Violence Strategy recognises that many agencies involved in working with domestic violence issues fail to make effective interventions and has therefore set out a set of 'minimum standards' for all agencies. These aim to ensure:

- That services are appropriate and accessible to all the communities they serve
- That agencies are actively working to develop such services
- That people are able to refer themselves to suitable projects.

In addition to this, the GLA has set out specific expectations of the NHS at borough level:

- Exploring the possibility of outreach and advocacy services in primary care settings
- Primary Care Trusts should nominate a specific individual with responsibility for domestic violence, who should attend local domestic violence forums
- Local Delivery Plans should incorporate domestic violence in future planning<sup>7</sup>

### **Work with registered social landlords**

If the objectives of the Homelessness Act are to be met, it is crucial that local authorities are able to act strategically in partnership with other local agencies. The relationship with registered social landlords is particularly important, given the rate of transfer of housing stock to these bodies and the increasingly number of 'arms length' arrangements in place. At present, the variation in practice between individual registered social landlords means it is not always easy for local authorities to monitor their performance and produce a co-ordinated response.

Gloucester's Co-ordinated Community Response to Domestic Violence is made up of statutory and voluntary agencies. It has produced a Statement, providing an overarching framework for local registered social landlords in relation to domestic violence policy and practice. It is intended that local

social landlords sign up to the Statement and agree to meet a series of strategic housing objectives. These include:

- Developing information exchange protocols to enable countywide monitoring and tracking of individual cases of domestic violence and the provision of statistical information on the incidence of domestic violence
- Agreement to include issues of domestic violence within the registered social landlord's own strategy, a review of current procedures and the production of an Action Plan to implement any issues arising
- Developing sensitive policies, for example on rent arrears.

Shelter believes that such an approach has benefits for people experiencing domestic violence, because it provides a means of ensuring a consistent response, regardless of which social landlord they are housed by. We therefore encourage the development of such responses in other local authority areas.

### **Improving the 'evidence base' for domestic violence**

More than a Roof states the importance of improving current research and data collection, so that a thorough analysis of the causes of homelessness can be made. Accurate and comprehensive data provides the foundation for local authorities to develop responses to homelessness based on identified local needs. In line with this aim, More than a Roof encourages local housing authorities to gather information from a range of sources as part of the homelessness review. Supporting People data, in particular, will be important in providing local authorities with an accurate and comprehensive picture of the support needs of vulnerable people, including those experiencing domestic violence.<sup>8</sup>

### **Recording data: homelessness acceptances**

However, government has also made it clear that a major part of monitoring of local authorities' performance against main causes of homelessness will continue to be via collection and analysis of their quarterly statistics on homelessness acceptances (the 'P1E' form)<sup>9</sup>. In the context of violent relationship breakdown, in particular, this approach is likely to cause problems. The government's own research, 'Reducing DV - What Works?' recognises that P1E returns are likely to under-estimate need, because they are not required to cover the full range of possible outcomes for victims of domestic violence who present to the local housing authority for assistance.<sup>10</sup> Such outcomes include: local authority refusals of people as homeless, or in priority need; other reasons for

homelessness not being recorded; re-housings through other routes, such as transfers/housing register (a circumstance under which local authorities are not currently required to produce figures). A very high percentage of households experiencing domestic violence include children and will be recorded as being in homeless under this category of priority need. This means that official estimates are even less likely to present an accurate picture of the problem.<sup>11</sup>

Shelter has recently carried out an analysis of P1E returns across England. The analysis illustrates that there are wide regional variations in the number of homelessness acceptances due to violent relationship breakdown.

Breakdown of priority need households fleeing domestic violence by region

<b>Region</b>	<b>% of all England Priority Need Households fleeing domestic violence</b>	<b>Decisions per 1000 household</b>
North East	8.0	0.49
Yorks and Humberside	15.8	0.49
East Midlands	6.9	0.26
East of England	5.7	0.17
London	5.6	0.12
South East	6.4	0.13
South West	5.7	0.18
West Midlands	27.5	0.83
North West	18.5	0.43

Base = 6473

'ODPM figures, 2001/02' <sup>12</sup>

Effective implementation of the Homelessness Act is being potentially undermined by the current gaps in data collected by local authorities. P1E returns are not comprehensive or sophisticated enough to be an effective basis for future service development. Shelter welcomes the recent consultation paper issued by the ODPM,<sup>13</sup> proposing changes to the present P1E form. We particularly support the paper's proposal for the P1E form to include secondary causes of homelessness, as we believe this would go some way to unmasking the true extent of relationship breakdown amongst homeless households. As a longer-term aim, Shelter believes that ODPM should consider the development of a

system that allows for case-by-case recording, giving comprehensive details of the circumstances and support needs of all people who apply to local authorities as homeless.

**Is current legislation and guidance sufficient to provide a safety net for people who are vulnerable as a result of leaving their home due to domestic violence?**

Shelter believes that to be effective, any 'safety net' provided through legislation and guidance must be available to everyone who leaves their home as result of domestic violence and must include appropriate housing and support, based on individually assessed need. Legislation and guidance should guarantee this, regardless of where victims and their families are currently living, or wish to live to escape the threat of violence.

Recent legislation and guidance has brought some positive changes to the 'safety net' provided to victims of domestic violence. Aside from the new strategic duty, the Homelessness Act's widening of the definition of homelessness to include any applicant who is suffering violence/threats of violence from another person, should enable more vulnerable people to gain the access they need to housing. The Act's amendment of the definition of local connection prevents local authorities referring applicants to another district in which they have previously suffered violence and would be liable to experience further violence provides a better degree of protection than was previously available.

However, there are still problems with legislation and guidance as it stands.

1. Victims of domestic violence still do not automatically qualify as being in priority need for housing. The Homelessness Act retains the previous 2-stage process for people applying as homeless to local authorities, meaning that some victims must also establish that they are vulnerable as a result of fleeing violence, as well as having fled the violence, or threats itself. Whilst the Code of Guidance states that fleeing violence/threats of violence should be a factor in local authorities' assessment of vulnerability, there is evidence to suggest that this guidance is not providing protection for all people in this position. WAFE reports that single women and people without dependants - in London and other areas of England - experience great difficulty in being accepted as vulnerable and that there has been no significant improvement in this situation since the Homelessness Act came into force.<sup>14</sup>
2. Whilst the Homelessness Code of Guidance encourages sensitivity to women fleeing violence, local authorities are not bound by its contents when making decisions on homelessness. The consideration of 'vulnerability' therefore remains at the discretion of the local authority that victims of domestic violence apply to. A recent survey of approaches of women (mainly with children) to local authorities showed that 18% of applicants had problems establishing vulnerability because of the evidence they were required to produce in order to show that violence had occurred (Humphreys and

Thiara, 2002)<sup>15</sup>. Evidence from Shelter's Housing Advice Centres also demonstrates that problems persist in this regard since the Homelessness Act 2002 came into force.

A woman with a young son applied to her local authority early in 2003 for housing assistance, but was judged 'not homeless' on the grounds that she still had a LA tenancy and was unable to provide sufficient evidence that she was at risk of violence. The woman then sought help from a housing advice centre, who gathered evidence on her behalf from her GP concerning the actual and continuing threat from the former partner. A review of the decision was held, but confirmed the original ruling, on the basis that that the risk had still not been proved. It took a further review for the local authority to accept the woman as being homeless and in priority need.

3. There continues to be much regional variation in local authority practice when dealing with victims of domestic violence:
  - In some local authorities, all applicants are required to apply as homeless; others channel people through the housing register or transfer process, whilst other local authorities encourage them to remain in the home until an offer of suitable housing is made.
  - Whilst some local authorities operate policies that aim to remove the perpetrator of the violence, others compel victims to relinquish their tenancies immediately
  - There are problems with local authorities violating regulations on the payment of housing benefit on 2 properties, both for a 4-week period (where there is no intention to return to the property) and for 52 weeks, where there is an intention to return.<sup>16</sup> This causes financial hardship for victims and their families and means that they are forced to give up their tenancy before they have properly considered what options they wish to take.

Recent research has linked the numbers of acceptances following domestic violence by individual local authorities to local housing market conditions. In areas of high demand, homeless people are more likely to be asked to pursue legal remedies to resolve their housing problems before they present as homeless, or be referred out of the district, regardless of their wish to live there.<sup>17</sup>

Shelter believes that the present legislation and guidance does not offer sufficient protection to all people fleeing domestic violence. We believe that all people fleeing domestic violence are vulnerable and should be regarded as such by homelessness legislation. The Homeless Persons (Priority Need) (Wales) Order 2001 extends the definition of priority need in Wales to include anyone who is fleeing domestic violence or

who is at risk of such violence if s/he returns home. Shelter believes this offers a better means of protecting victims of domestic violence and would also help remove current inconsistencies in local authority practice in relation to homelessness acceptances on the grounds of vulnerability. We therefore recommend that the Welsh Order be adopted in England too.

### **How well do policy, safety and support services affect victims' ability to stay in their homes/use emergency accommodation?**

#### **What is the importance of support services?**

The availability of comprehensive support services is now recognised as an important factor in the prevention of homelessness, including repeat homelessness. Shelter believes that leaving the family home and presenting as homeless should be regarded as a last resort for victims of violence. Homelessness causes upheaval for victims and their families and damages health, education and social networks. Dealing with violent relationship breakdown in a reactive way - via the homelessness route - is also an economically costly and inefficient way of dealing with the problem for local authorities and other bodies involved in tackling domestic violence.<sup>18</sup> The most recent government figures - showing an increase in homelessness due to relationship breakdown - suggest that much remains to be done in developing approaches that prevent homelessness.

The nature of abuse means that victims of domestic violence and their families have support needs that are distinct from those of other groups of homeless people. Leaving an abusive situation can be a long-term process and people may need several stays in temporary accommodation before they are ready to do this. The trauma of domestic violence means that people often also need time in supported accommodation before they are ready to move into independent accommodation and also support in order to make a successful transition.<sup>19</sup> For people who wish to remain in their homes, the provision of personal security measures, outreach and advice services are also vital in preventing them becoming homeless in future.

#### **Tenancy sustainment services**

Tenancy support is widely recognised as being beneficial in helping people maintain their accommodation and preventing future homelessness.

Shelter's Homeless to Home projects are designed to help formerly homeless families sustain a tenancy and live successfully in the community. The projects have been established in response to evidence that homeless families have range of needs making it difficult for them to sustain a tenancy without any form of support. Homeless to Home helps with practical, emotional and financial support.

Figures from 3 Homeless to Home projects indicate that the largest single group they assist is people fleeing domestic violence (38%). They have had considerable success in helping families sustain their tenancies. This success has been based on providing flexible support and effective joint working, with health and social services.

Ms X became homeless when her relationship broke down. Her husband remained in the property. The woman and her children had been allocated a property when H2H became involved. The children were extremely unsettled, especially the youngest, whose behaviour became very destructive and problematic. Ms X tried very hard to maintain the children's education, keeping them in their original schools - this very difficult, as now 8 miles away. Due to increasing demands of her children, Ms X forced to leave her job and claim benefits.

Support worker from H2H visited regularly and offered on-going resettlement support, including benefits, utilities and support with issues around behaviour of youngest child. Ms X is now successfully settled in her home.

### **Advice and assistance**

Advice services are also being increasingly recognised as having an important role in preventing homelessness. Information and advice is crucial for people who are not owed a duty of housing by local authorities and those who do not seek re-housing; it enables people to maintain their accommodation and to make informed choices about their housing options.

Rent arrears is one area where the provision of good advice can make a significant difference to people who experience domestic violence. Rent arrears will often be accumulated at the time of a relationship breakdown. In some cases, they will be a contributory factor to the relationship ending. Women with children are often vulnerable to the build up of arrears, as they may have been financially dependent on their partner. Sometimes, the partner who has been providing the main source of income will refuse to contribute any more to the upkeep of the joint home, or may leave - allowing arrears to build up. Rent arrears can also mean that people are ineligible under transfers and allocations policies. Social landlords should therefore be encouraged to provide advice services, covering money and benefits and housing benefit entitlements. These should be well publicised, with people encouraged to contact the landlord as early as possible.

In Trafford, consultation with the local Domestic Violence Forum and Crime Reduction Partnership raised the profile of domestic violence locally and has

led to changes in council homelessness policies and new services. This has included the funding of dedicated workers

The Housing Advice team now has a specialist worker to oversee all applications that involve domestic violence. This has meant fewer applications to the Homeless Persons Unit and better outcomes for those people seeking solutions to their housing problems.

The council has also adopted a policy of 'homeless at home'. This allows victims of domestic violence to apply for re-housing, but remain at home whilst they are awaiting an offer of permanent accommodation. Support and security measures are provided, according to the person's needs. This approach avoids the upheaval of moving to temporary accommodation and is especially appropriate for people with multiple or specialist needs.

The range of services and organisations involved in dealing with domestic violence means that the 'one-stop approach' is particularly appropriate in this context.

LB Croydon operates a '1-stop' approach for people experiencing domestic violence. A centre is open 2 days a week and offers assistance from a range of agencies, including:

- The police - to log incidents and take reports of criminal charges
- A legal representative - to help with queries about injunctions or restraining orders and other legal powers
- The housing department - to help find permanent and temporary accommodation and give advice on benefits.

There are also plans to bid for an advocacy project.

### **Problems with current support services**

Research carried out by the ODPM identifies a range of problems in providing the right kinds of support for people experiencing domestic violence:

- Access to services is not always straightforward for victims and their families
- There is a lack of consistency in the types of services that are provided in local authority areas: a given area may be well-catered for in terms of benefits advice and advocacy, for example, but lacking in services that provide counselling and work with children.

- Re-housed households have particular difficulty in accessing support
- Nationally, there is very little women-only provision, specialist accommodation for BME groups and those with additional support needs, such as mental and physical health problems and learning difficulties.<sup>20</sup>

### **a) Funding and support**

The Supporting People grant was recently announced as £1.4 billion for the year 2003/4 and is now the major source of funding for housing-related support in England. Supporting People offers a potentially more stable funding base for services to victims of domestic violence than has been previously available to providers. Approximately 5000 people 'at risk of domestic violence' are being supported under the regime; approximately 20% of families in temporary accommodation are also covered.

However, the 'housing-related' criteria of Supporting People also means that certain services vital to victims of domestic violence cannot be funded through this route. Whilst there is recognition that Supporting People needs to be integrated with the objectives of homelessness strategies and Crime and Disorder Partnerships, the timing of planning frameworks are not conducive to this - homelessness strategies have recognised gaps in services after Supporting People allocations have already been made. The Supporting People 'pot' is already under considerable pressure and it is unlikely, at least in the short term, that more money will be allocated through this route to expand existing services.

Supporting People's favouring of a floating support model also means that the model of comprehensive services, as envisaged in 'More than a Roof', is not actually being provided. There are particular problems with funding for outreach and children's services. The majority of households accepted as homeless following violent relationship breakdown contain children. Children also form two thirds of the refuge population.<sup>21</sup> However, services to support them lack a stable funding base: they are largely reliant on Community Fund money.<sup>22</sup> Social services authorities often fail to prioritise funding to this group, despite the clear links with their own functions. Outreach services are similarly reliant on charitable funding.

The current government Green Paper, 'Every Child Matters' sets out a framework for services to all children from birth until the age of 19. It aims to integrate current services and to protect children from 'falling through the net' of provision. It proposes to introduce Directors of Children's Services in every local authority, who will manage integrated budgets and to provide overall accountability for services to children in their area. Homeless families and children are recognised within the Paper as a group at particular risk and needing better access to services than is currently available.

We suggest that the Green Paper presents an ideal opportunity for national and local government to recognise that children who are part of households experiencing domestic violence have a clear need for support and to establish a clear funding and planning framework to address these needs.

### **b) Temporary accommodation and support**

Current shortages in the supply of social housing mean that many victims and their families will spend a period of time in temporary accommodation provided via the local authority. Refuges are considered the most suitable form of temporary accommodation for people fleeing domestic violence, due to the specialist support they provide. However, refuges only account for about 15% of temporary placements and are concentrated in metropolitan areas, London boroughs and unitary authorities.<sup>23</sup> Elsewhere, lack of alternatives, particularly in areas of high demand for housing, means that people fleeing violence are frequently placed by local authorities in other, less suitable forms of accommodation.

Shelter believes it is vital that victims of domestic violence and their families receive good quality and appropriate support, regardless of the form of temporary accommodation they are placed in. At present, there is no requirement on local authorities to place people in temporary accommodation that gives them access to appropriate support and in locations that enables them to maintain social networks. This situation means that many people leave before they are made an offer of permanent accommodation. ODPM figures show that in 2001/02, 25% of all temporary placements ended in this way.<sup>24</sup> A proportion of these will include people fleeing violence and may result in them becoming homeless again, or returning to an unsafe family home.

Shelter believes that one way to address this problem is to set minimum standards for temporary accommodation. These should relate both to the physical standards of temporary accommodation and the support provided to people whilst they stay there. We welcome the government's intention to issue statutory guidance to enforce minimum standards in all forms of temporary accommodation and set additional standards for B & B accommodation. We have proposed additional measures that would ensure that homeless people have access to relevant health, education and social care services and to ensure that the temporary accommodation offered is suitable, based on the assessed needs of the applicant and their household. Shelter believes these will improve the quality and consistency of services for people in temporary housing; they will enable people to make a better transition to permanent housing and thus reduce the risk of repeat homelessness.

### **c) Cross-authority working**

In recognition of the fact that there is considerable variation in services according to area, the ODPM has appointed 2 national Domestic Violence Co-ordinators. The Co-ordinators

will oversee work on a range of issues relating to the Supporting People programme, including supply mapping, monitoring of domestic violence in Supporting People strategies and ensuring that local housing strategies recognise the need for capital funding for refuges and move-on accommodation. As women and children fleeing domestic violence often need to move away from their local home, the ODPM also considers that domestic violence should be addressed through cross-authority arrangements put in place for Supporting People.<sup>25</sup>

Shelter believes that the approach taken in the Supporting People programme offers the possibility of achieving greater consistency in services between local authorities than currently exists. Whilst the Homelessness Act requires local housing authorities to produce homelessness strategies and develop services that respond to need within their district, there is at present no requirement for local authorities to view domestic violence as a cross-authority issue and therefore to co-ordinate their policies and practice in relation to domestic violence with nearby local authorities.

We suggest that the Homelessness Directorate consider the appointment of a dedicated worker for domestic violence to consider some of these issues. This person would have a role in monitoring local authority homelessness strategies and developing cross-authority initiatives. Such initiatives could include the development of reciprocal arrangements between local authorities, to improve access to accommodation for victims of domestic violence and their families who need to move from the district in which they are experiencing violence.

End Notes:

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- 24 Meth, F and Wigglesworth, R (2003), More than a Number, London: Shelter
- 25 DTLR/Supporting People (2001), Guidance on Support Provision for Women Fleeing Domestic Violence