

Refuge response: Consultation on local connection requirements for social housing for victims of domestic abuse.

Contact: Sophie Ireland, Senior Policy and Public Affairs Officer

May 2022

## **About Refuge**

- (1) Refuge is the largest specialist provider of gender-based violence services in the country, supporting thousands of women and children on any given day. We provide a national network of 41 refuges, community outreach programmes, child support services and independent advocacy services for those experiencing domestic, sexual, and gender-based violence. We also run specialist services for survivors of tech abuse, modern slavery, 'honour'-based violence, and female genital mutilation. Refuge runs the 24-hour National Domestic Abuse Helpline which receives hundreds of calls from women experiencing domestic abuse every day.
- (2) Violence against women and girls (VAWG) takes many different forms, including domestic abuse, rape, and other forms of sexual violence, stalking and harassment, modern slavery, forced marriage, honour-based abuse, and female genital mutilation. Domestic abuse can include physical, sexual, psychological, emotional, economic and tech abuse, and has a devastating impact on survivors. More than one in four women in England and Wales aged 16-74 experience domestic abuse at some point in their lives, and an average of two women are killed every week by their partner or ex-partner – a statistic which has not changed in decades.<sup>1 2</sup>

## Introduction

(3) Refuge strongly welcomes the opportunity to submit evidence to this consultation and expand on concerns raised during the passage of the Domestic Abuse Act regarding local connection requirements on social housing for victims of domestic abuse. Domestic abuse is, by its very nature, a housing issue, because domestic abuse and other forms of VAWG typically occur within the home. Women are most at risk of homicide at the point of, or shortly after, separating from a perpetrator and 70% of women killed by men from 2009 – 2018 were killed in their own home or the home they shared with a perpetrator.<sup>3</sup> Domestic abuse is also one of the top three causes of homelessness, and the leading cause of

<sup>&</sup>lt;sup>1</sup> ONS (2020), 'Domestic abuse prevalence and trends, England and Wales: year ending March 2020,' <u>https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/domesticabuseprevalenceandtrendsenglandandwales/yearendingmarch2020</u>

<sup>&</sup>lt;sup>2</sup> ONS (2020), 'Homicide in England and Wales: year ending March

<sup>2019&#</sup>x27;. <u>https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/homicideinengland</u> andwales/latest#how-were-victims-and-suspects-related

<sup>&</sup>lt;sup>3</sup> Femicide Census, UK Femicides 2009-2019

homelessness among women, with 11.6% of households recording 'domestic abuse' as their main reason for being homeless or threatened with homelessness in 2020/21.<sup>4</sup>

(4) Access to safe, secure housing is an integral part of a survivor's journey. It is a vital step towards escaping their perpetrator, rebuilding their life, and regaining their independence. For the many survivors, including children, who need to flee their home and local area to become safe from domestic abuse, accessing safety and housing stability in a new local area is vital. However, in our experience, many survivors face huge challenges accessing housing in a new area. This is often because many local authorities continue to apply a local connection test when allocating social housing, which leads to the disqualification of a significant proportion of survivors who must flee to a new area to become safe.

## Summary

- (5) Refuge strongly supports the proposal to introduce regulations to require local authorities to ensure that domestic abuse survivors are exempt from any local housing connection or residency requirements as part of their qualification criteria for applicants of social housing. Such regulations, if implemented by all local authorities, would make it significantly easier for many survivors to find a home in a safe location.
- (6) As the largest specialist provider of services for survivors of domestic abuse and other forms of VAWG, Refuge is in a unique position to share the views and experiences of survivors. This response has been developed in consultation with survivors and frontline staff and responds to the questions relevant to Refuge's work to set out the following key recommendations:
  - The proposed exemption should extend to <u>all</u> social housing applications made in England where the victim has fled from elsewhere in the UK and should be applied to domestic abuse survivors who were previously living in privately rented accommodation, privately owned housing, or temporary accommodation. It should also be applied to survivors who are rough sleeping and experiencing long-term homelessness, who may not have a specific form of accommodation from which they are fleeing.
  - The exemption should apply to <u>all</u> cases where the applicant has a housing need arising from experiences of domestic abuse and should not be time limited. A time limited exemption disregards the realities of domestic abuse and the housing barriers facing survivors.
  - In order for the proposed exemption to be effective as possible, Refuge recommends that it is accompanied by strong mechanisms to hold local authorities to account and an effective appeals process. We recommend that accompanying statutory guidance should include:
    - Clear guidance that the exemption applies to <u>all</u> local authority areas and survivors should have freedom of choice about the area they live.
    - Clear guidance that local authorities are not required to collect evidence of domestic abuse as part of a survivors' social housing application.

<sup>&</sup>lt;sup>4</sup> Live tables on homelessness - GOV.UK (www.gov.uk)

- Clear guidance that rent arrears should not reduce the priority for housing (including property owned by housing associations) of survivors of domestic abuse.
- A requirement on local authorities to automatically add the additional welfare needs reasonable preference category to cases of all survivors of domestic abuse.
- Requirements on housing practitioners to be provided with specialist training on identifying and responding to domestic abuse (including economic abuse, tech abuse and coercive control); work collaboratively with specialist services or any services the survivor identifies as essential support; always uphold the survivor's perception of risk as paramount; always consult the Domestic Abuse Statutory Guidance, Chapter 21 of the Homelessness Code of Guidance and the Power and Control wheels as reference in identifying behaviours and risks factors that are consistent with domestic abuse.

## **Consultation questions**

Q2 The government proposes to make regulations to require local authorities to ensure that domestic abuse victims are exempt from any local connection or residency requirements as part of their qualification criteria for applicants of social housing. Do you agree?

- (7) Refuge strongly supports the proposal to introduce regulations to require local authorities to ensure that domestic abuse victims are exempt from any local housing connection or residency requirements. Survivors currently face a postcode lottery with regard to the application of current statutory guidance on residency requirements and local connection criteria, as well as difficulties arising when local authorities do not apply current guidance and law. Current statutory guidance only 'strongly encourages' local authorities to allow survivors of domestic abuse to be exempt from residency requirements, and primarily makes reference to those in refuges or other safe temporary accommodation within their district who have fled to <u>another</u> area. Whilst Refuge's frontline staff have reported an improvement in the application of statutory guidance on local connection criteria since its introduction in 2018, it remains the case that local authorities apply it extremely inconsistently, which creates significant barriers for survivors trying to settle and rebuild their lives.
- (8) Despite current guidance, survivors are still being denied social housing because they have no local connection to an area. For example, Refuge's frontline staff have highlighted instances where local authorities have refused survivors of domestic abuse access to housing as they do not meet the two-year residency criteria, even though a different section of the same policy informs that survivors are exempt. Often, the allocation schemes are misleading and do not make these exemptions clear enough. Staff have highlighted that many local authorities dismiss claims for housing assistance as soon as residency requirements are not met without assessing any relevant exemptions, including risk of abuse. For example, one frontline worker said 'local authorities often refuse to help at all if a woman has fled from another area. I try to advise them of the legal requirements but sadly I have had several councils hang up on me when I say this.'

- (9) These barriers cause significant delays in survivors accessing safe accommodation, as well as prolonged periods of time in refuges, which leads many women to search for private rented accommodation. Survivors searching for private rented accommodation are often forced to accept unsuitable properties due to the financial difficulties resulting from leaving a perpetrator and the benefit cap, which applies to all survivors not living refuge or other safe temporary accommodation. For many survivors, leaving an abuser necessitates becoming a lone parent family. Lone parent families with young children are disproportionately impacted by the benefit cap and the vast majority (95%) of lone parent families claiming housing benefit are women.<sup>5 6</sup> Analysis by Shelter shows that the cap amount is too low to cover the cost of the very basic, essential goods that a family cannot go without (such as housing, bills, food and personal care items).<sup>7</sup>
- (10)The rising cost of living will exacerbate this issue for survivors, putting them at even greater risk. Finances can often be a barrier to leaving and Refuge is concerned that increasing numbers of women may feel forced to stay with perpetrators. Ultimately, the misapplication of current guidance on local connection criteria by local authorities is forcing survivors who are eligible for social housing into unsuitable and unsustainable private rented tenancies which they often struggle to afford and can lead to an increased risk of homelessness in the long-term. One survivor supported by Refuge told us that, having spent two years been denied social housing on the grounds that she had 'local connection' to the area, she felt she had no choice but to find private rented accommodation. Introducing regulations to require local authorities to ensure that domestic abuse survivors are exempt from local connection criteria is therefore vital to protecting survivors and their children and helping to tackle the financial barriers they face when leaving a perpetrator.
- (11) In Refuge's experience, if a survivor has been in refuge for longer than six months, local authorities will often only support the survivor to find social housing in same local area that she sought refuge, on the grounds that she has accrued a 'local connection'. The vast majority of survivors seek refuge in a different local authority area to the one in which they experienced abuse <sup>8</sup>. This is often a decision made in an emergency or the only area with a vacant refuge space. It is not necessarily a suitable or desirable place for a survivor to settle long term, and survivors should not be penalised for accruing a local connection to the area to which they have fled. Survivors' stay in a refuge may be prolonged for a number of reasons, including the housing barriers that this consultation aims to in part address. It is vital that survivors have a choice in where they live, which must allow for survivors to have been somewhere long enough to establish a local connection, but still have the right to move anywhere.
- (12) Ultimately, the proposed exemption should be driven by promoting survivor choice and local authorities should not seek to make any areas 'off limits' to survivors. In some cases, Refuge's frontline staff experience local authorities not allowing survivors to apply for social housing in the area in which they fled from. There are many reasons why a survivor may want to settle in the area they fled from, such as family and friendship networks, employment or schooling, and they should be supported to do so if they choose. To ensure the proposed regulations are as effective as possible, Refuge therefore recommends that

<sup>&</sup>lt;sup>5 5</sup>Shelter, (2018), Submission to Work and Pensions Select Committee Inquiry into Benefit Cap, Shelter

<sup>&</sup>lt;sup>6</sup> Kleynhans, S., (2019), International Women's Day we must see an end to women in housing poverty, Shelter

<sup>&</sup>lt;sup>7</sup> Women-s Aid Shelter - Benefit Cap and Domestic Abuse Briefing1.pdf (ctfassets.net)

<sup>&</sup>lt;sup>8</sup> The Domestic Abuse Report - Womens Aid

they are accompanied by clear guidance indicating that the exemption applies to <u>all</u> local authority areas.

(13) Current systems to appeal local authority decisions are not robust and Refuge's frontline staff encounter great difficulty when trying to ensure local authorities comply with existing guidance. Challenging local authority decisions is incredibly time consuming for survivors and often requires legal representation via public funding (which is difficult to obtain) or the support of a housing advocate. The review process can often take up to three months, which further delays the survivor accessing her housing rights and can also prolonging a survivors' stay in a refuge. Refuge's frontline staff report that the onerous process often wears survivors down and results in them accepting unsuitable properties out of desperation. Findings from Refuge's Housing Advocacy service have shown that women who receive support from a Housing Advocate are 45% more likely to receive appropriate social housing<sup>9</sup>. This is a startling finding which highlights that those who have access to specialist advocacy receive better housing outcomes, even though all women in similar circumstances should be afforded the same housing rights. Introducing regulations to require local authorities to ensure that domestic abuse victims are exempt from any local connection or residency requirements would reduce the number of survivors needing to challenge local authority decisions, reduce strain on an already overstretched specialist domestic abuse sector, and improve overall housing outcomes for survivors. It is therefore vital that these regulations are accompanied by strong mechanisms to hold local authorities to account, as well as effective appeals process to ensure it is implemented by local authorities and leads to meaningful change.

Louise, a survivor of domestic abuse supported by Refuge, was experiencing multiple forms of abuse and it wasn't safe for her to stay in her local area. She applied for social housing in another locality but was turned down on the grounds that she had 'no local connection to the area'. She was told by the council that, even if they did accept her application, she'd be waiting 18 months for a property to become available.

As it was unsafe for Louise to continue living in her local area, she moved to unsuitable temporary accommodation. She couldn't get her child into school because she didn't know how long she would be in the area, and she told us she was 'in an uncomfortable and unhappy situation with no real way to prepare for what might come next'.

Louise was referred to a housing advocate who supported to get her application accepted. The local authority admitted that they had made a mistake in placing her on the low priority list. Louise told us that she felt as though the local authority made it extremely difficult for her to access safety, despite her having a right to accommodation in that area.

Q5 Do respondents agree that local connection should be defined by reference to Section 199 of the Housing Act 1996?

(14) Refuge strongly recommends that there should be a blanket exemption from local connection criteria for <u>all</u> survivors of domestic abuse, and it should therefore not be necessary amend the definition for it to be disapplied.

<sup>&</sup>lt;sup>9</sup> Refuge data Oct-March 2022

- (15) However, given the inconsistent application of current guidance, the definition of local connection criteria would benefit from being broadened to take into consideration the impact of various forms of domestic abuse and how this might affect survivors' ability to gain a local connection. For example, women fleeing so-called 'honour-based abuse' or abuse by family may be penalised in social housing allocations because they have had to break all ties with their families. Often, in these types of cases, close friends become a survivors' familial network. Research by Crisis found that women experiencing homelessness tend to put a greater reliance on informal arrangements with friends, family and acquaintances. This places women who have fled domestic abuse in a position where they are reliant on informal networks for vital support such as housing.<sup>10</sup> Refuge recommends recognising this in legislation through introducing 'friendship networks' into local connection criteria.
- (16) Another issue for survivors is that many allocation policies also give higher priority for those who have a local connection on the basis of employment within the district. This policy fails to consider how domestic abuse, including post-separation and economic abuse can have an impact on a survivor's ability to return to work. Economic abuse is a common form of domestic abuse which involves an abuser restricting a person's ability to acquire, use and maintain money or other economic resources. Economic abuse is rarely the only form of abuse a perpetrator uses and instead many survivors experience a range of types of abuse as part of a pattern of control and coercion. In response to a survey conducted by Refuge, 80% of survivors have experienced emotional, sexual, or physical abuse in additional to economic abuse.<sup>11</sup> For some survivors, economic abuse can have a direct impact on their ability to secure employment or financial stability. Reduced confidence and trauma as a result of abuse can also affect survivors' ability to work. For others, years out of the workplace due to the abuse they have experienced limits their economic independence further, with many having been prevented from working or accessing training or education by the abuser.<sup>12</sup> Furthermore, it is often unfeasible for survivors to work full-time whilst living in refuge, which can impact survivors' longer-term employment prospects after they move on.
- (17) To be clear, it should not be necessary to amend the definition of local connection criteria if it is to be disapplied to survivors of domestic abuse and Refuge strongly recommends that the exemption applies to all survivors of domestic abuse. We have included these suggested changes to the definition as they would improve outcomes for survivors based on our knowledge of the current application of statutory guidance.

Q6 Do respondents consider that exemptions of local connection or residency tests for domestic abuse victims should be time limited? If so, what length of time is appropriate, when should the period begin and who should make that assessment?

Q7 Alternatively, do respondents consider, instead of having a time limited exemption, that we should provide for ensuring exemptions from local connection or residency tests apply where the need to move to a new area relates to reasons connected with domestic abuse?

<sup>&</sup>lt;sup>10</sup> Bretheton, J & Pleace, N. (2018), Women and Rough Sleeping, a critical review of current research and methodology, York: University of York. Available at: https://www.mungos.org/wp-content/uploads/2018/10/Women-and-Rough-Sleeping-Report-2018.pdf [accessed: 12/04/19]

<sup>&</sup>lt;sup>11</sup>Know-Economic-Abuse-Report-2020.pdf (refuge.org.uk)

<sup>&</sup>lt;sup>12</sup> Davidge, S. and Magnusson, L., (2019), The economics of abuse, Bristol: Women's Aid

- (18) Refuge strongly opposes introducing a time limit to the exemption. This proposal overlooks the realities of domestic abuse, including that abuse often occurs post-separation, and implies that there is a fixed time at which survivors are no longer at risk, or do not have a housing need that arises from the abuse. In Refuge's experience, domestic abuse rarely ends when the survivor and perpetrator are physically apart and living in separate homes. As recognised within the statutory definition of domestic abuse as set out in the Domestic Abuse Act 2021, domestic abuse often continues post-separation, including various forms of coercive and controlling behaviour and economic abuse<sup>13</sup>. Refuge's Unsocial Spaces report found that 35% of survivors began to experience online abuse by a former partner after the relationship had ended.<sup>14</sup> The trauma caused by domestic abuse can have devastating and long-term consequences for survivors' mental wellbeing and several studies have highlighted the prevalence of PTSD among survivors of domestic abuse, which often takes years to occur<sup>15</sup>. Also, survivors' risk level often heightens at the point of fleeing their perpetrator and remains dynamic throughout their journey to resettling somewhere new. Many victims of domestic homicides have been assessed as relatively 'low risk', and the 2020 Femicide census found that 37% of women killed by a partner/former partner had separated or taken steps to separate.<sup>16</sup> Introducing a time limit to the exemption would cut off a vital gateway to safety for survivors who remain at serious risk from their perpetrator long after they have fled, or the abuse has 'ended'.
- (19) Further, many women in urgent housing need will continue to live in the home where the abuse has taken place. Survivors have different housing and safety needs, with some survivors requiring emergency support in refuges and others needing to stay safely within their own home. There are many reasons that a survivor may choose to stay in a home with her perpetrator including a lack of access to money (sometimes as a result of economic abuse), fears around homelessness or being forced to live in unsuitable housing or worries about uprooting her children from their home and vital stages of their education<sup>17</sup>. It is equally critical that survivors who are not able or do not want to go into refuge able to find safe and suitable housing and are not excluded from the proposed exemption. It is not clear how the proposal to introduce a time limit would work for a survivor in this situation, who are not seen by the local authority to have 'fled'.
- (20) The proposal to introduce a time limit also disregards the multiple barriers survivors face in applying for social housing and could be used as a gatekeeping tactic by local authorities. Housing barriers often result in women staying in refuges long enough to accrue a local connection and social housing applications often take over a year. We are concerned that women whose housing situation has not been resolved within the time limit could suddenly find that they do not qualify for the exemption. This would likely have a disproportionate impact on migrant women with no recourse to public funds, who often stay in refuge for a prolonged period whilst their status is regulated.
- (21) Ultimately there is no appropriate point at which to begin a time period of exemption for survivors of domestic abuse, or to end one. We agree that ensuring exemptions from local connection or residency tests apply where the need to move to a new area relates to reasons connected with domestic abuse is the preferable option, however there is a risk that

<sup>&</sup>lt;sup>13</sup> Domestic abuse: draft statutory guidance framework (accessible version) - GOV.UK (www.gov.uk)

<sup>&</sup>lt;sup>14</sup> <u>Unsocial-Spaces-for-web.pdf (refuge.org.uk)</u>

<sup>&</sup>lt;sup>15</sup> <u>Domestic violence and mental health: a cross-sectional survey of women seeking help from domestic violence support services - PMC (nih.gov)</u>

<sup>&</sup>lt;sup>16</sup> 010998-2020-Femicide-Report V2.pdf (femicidecensus.org)

<sup>&</sup>lt;sup>17</sup> <u>The-Domestic-Abuse-Report-2020-The-Hidden-Housing-Crisis.pdf (womensaid.org.uk)</u>

this could result in survivors being given the impossible burden of evidencing the ongoing nature of abuse. Domestic abuse takes place behind closed doors and is therefore difficult to measure or 'evidence'. The vast majority (80%) of survivors Refuge supports do not report to the police and in our experience, housing officers often characterise domestic abuse as antisocial behaviour, which demonstrate the difficulties of 'proving' domestic abuse is occurring or has ended, and therefore the time limit should begin. Refuge therefore strongly recommends that the proposed exemption should apply to <u>all</u> cases where the applicant has a housing need arising from experiences of domestic abuse and should not be time limited.

Q8 Do respondents agree that the proposed exemption to local connection and residency tests should extend to social housing applications made in England where the victim has fled from elsewhere in the UK?

(22) Refuge agrees that the proposed exemption should extend to social housing applications made in England where the victim has fled from elsewhere in the UK. Survivors should be able to move across different parts of the UK in order to be safe and their housing entitlements should not change as a result of the location they are fleeing from or have settled temporarily.

Q9 Do respondents agree that the proposed exemption from local connection and residency tests should be applied to domestic abuse victims in privately rented accommodation, privately owned housing and temporary accommodation? If not, please explain why.

- (23) Refuge agrees that the proposed exemption should be applied to domestic abuse survivors in privately rented accommodation, privately owned housing, and temporary accommodation. In addition, we support the National Domestic Abuse Policy and Practice Group in recommending that the proposed recommendation should be applied to survivors who are rough sleeping and experiencing long-term homelessness, who may not have a specific form of accommodation from which they are fleeing.
- (24) As outlined in paragraph 18, there are many reasons that a woman might continue living at home with her perpetrator and it is vital that the exemption applies to survivors in urgent housing need who are not residing in a refuge. Women continue to face significant barriers in accessing specialist support services which could prevent them from moving on to refuge. For example, Women's Aid Federation England's Annual Audit 2022 found that in the year 2020/21 26.5% of referrals received in refuge services were rejected due to a lack of space or capacity<sup>18</sup>. All survivors of domestic abuse, regardless of their housing situation, are at significant risk of economic abuse from their perpetrator. For survivors who own their own home, they may not be able to access finances that are tied up in their property (often shared with their perpetrator) and may be required to continue their mortgage payments for fear of debt and negative credit ratings. Ultimately, the proposed exemption should emphasise the safety and choice of the survivor, and not discriminate against survivors based on the type of accommodation they are making the application from.

Q11 Is there a need for further statutory guidance with regards to collecting evidence of domestic abuse to support local authorities when considering applications for social housing, to make sure the vulnerabilities of the victim and needs of the local authority are balanced. If so, what might this include?

<sup>&</sup>lt;sup>18</sup> The-Domestic-Abuse-Report-2022-The-Annual-Audit.pdf (womensaid.org.uk)

- (25) Current statutory guidance does not require local authorities to collect evidence of domestic abuse as part of survivors' social housing application. However, in Refuge's experience, there are long standing issues of housing authorities requesting corroborative or police evidence when considering survivors' applications for social housing. This bad practice is widespread, despite statutory guidance advising against it. As outlined in question 6 and 7, domestic abuse is a crime that takes place behind closed doors and is therefore difficult to measure or 'evidence'. The vast majority of (80%) of survivors Refuge supports do not report to the police and therefore police evidence is not an appropriate criterion on which to evidence that domestic abuse has taken place. Ultimately, survivors should be trusted when they disclose their abuse to the local authority and supported to access secure housing in a safe location. Refuge strongly opposes introducing a requirement on local authorities to collect evidence of domestic abuse. Instead, accompanying statutory guidance should outline effective appeals process to hold local authorities to account for poor practice to ensure it isn't exacerbated by the proposal to introduce regulations to exempt survivors of domestic abuse from local connection criteria.
- (26) In Refuge's experience, survivors are often given reduced priority for social housing because they have rent arrears. This problem is particularly significant when local authorities discharge their housing duties via housing associations, which commonly have very strict and inflexible policies regarding rent arrears. It is an important principle that debt should not take precedent over a woman's need for safe and secure housing. Furthermore, current policies fail to consider that a woman is likely to be in rent arrears as a direct result of economic abuse, which often leaves women without access to and control over their income. In many cases, perpetrators control the household income and survivors have no control over how their joint finances are being spent. Building up rent arrears can be a deliberate tactic by the perpetrator to reduce survivors' options to live independently from then. As outlined in question 5, there is a clear link between domestic abuse and loss of income and employment which may also lead women into falling into other debt. It is vital that rent arrears do not reduce the priority for housing (including property owned by housing associations) of women who have experienced domestic abuse. Refuge therefore recommends that statutory guidance includes clear guidelines to this effect.
- (27) Currently, statutory guidance informs that those with medical, social or welfare needs should get additional preference and recognises that those who are recovering from the impact of domestic abuse are likely to have these additional needs. The guidance 'strongly encourages' local authorities to apply the medical and welfare reasonable preferences grounds to survivors and their children who have escaped abuse and are being accommodated in a refuge or other temporary accommodation. The Domestic Abuse Act 2021 recognised children as victims of domestic abuse in their own right. To ensure the trauma children experience is minimised, it is essential that they, as well as their primary carers who have also endured abuse, are able to move into safe and stable accommodation when the time is right. In some cases, this will also free up essential bed space within refuges. The guidance should be changed to reflect this and introduce a requirement for local authorities to automatically add the additional welfare needs reasonable preference category to cases of all survivors of domestic abuse.
- (28) Refuge also recommends that accompanying statutory guidance should require housing practitioners to:
  - be provided with specialist training on identifying and responding to domestic abuse (including economic abuse, tech abuse and coercive control).

- work collaboratively with specialist services or any services the survivor identifies as essential support.
- always uphold the survivor's perception of risk as paramount.
- always consult the Domestic Abuse Statutory Guidance, Chapter 21 of the Homelessness Code of Guidance and the Power and Control wheels as reference in identifying behaviours and risks factors that are consistent with domestic abuse.

Q13 Are there any barriers that prevents neighbouring local authorities from working together to support domestic abuse victims and their families applying for social housing outside their area?

(29) In Refuge's experience, reciprocal arrangements are not currently working effectively to support survivors of domestic abuse to secure social housing. Reciprocal arrangements are informal, and not part of a legal framework which often limits survivors' access to secure and suitable housing. To support joint working between local authorities, Refuge recommends formalising reciprocal arrangements so that managed reciprocal schemes are adopted across all regions. These schemes, when facilitated by an independent agency, allow victims of domestic abuse with social housing tenancies, to apply to the scheme to request a reciprocal arrangement with another local authority that is signed up to the scheme. This will ensure survivors maintain security of tenure, support the application of proposed regulations to exempt survivors from local connection criteria and allow all local authorities reciprocally benefit from the scheme. An example of current best practice the Pan-London Housing Reciprocal scheme, which is a strong example of cooperative working between local authorities to try to maintain social tenancies for survivors.