

MAYOR OF LONDON

Shaun Bailey AM

Chair

London Assembly Housing Committee

C/o Sarah-Jane.Gay@london.gov.uk

Our ref: MGLA230223-0986

Date: 15 May 2023

Dear Shaun,

Thank you to the London Assembly Housing Committee for sharing with me its report, *Women and housing: a gap in the market*.

I commend the Committee's work in investigating and drawing attention to the particular housing needs of women. I am acutely aware that women are disproportionately affected by London's housing crisis, for a range of reasons, including their lower incomes and disproportionate experience of homelessness, domestic abuse, and overcrowding. I am also aware that this regrettable situation has been made worse by both the COVID-19 pandemic and the current cost of living crisis.

I want to assure you that I am already using the powers and resources available to me to help women access housing that meets their needs and is affordable to them.

This means doing all that I can, through both my planning powers and my Affordable Homes Programme, to increase the supply of affordable homes. I appreciate that most affordable homes are not specifically for women. However, women are more likely to need and to secure affordable housing because of the disproportionate way that London's housing crisis affects them. This means that increasing the supply of affordable homes helps meet the needs of women.

Meeting women's housing needs also means supporting provision that meets the specific needs of some women. This includes those who have fled violence and domestic abuse and need safe accommodation with specialist support to rebuild their lives. I am working to improve provision for those women through my Domestic Abuse Safe Accommodation Strategy. It also includes women who have ended up sleeping rough, who have not always been identified or appropriately supported by rough sleeping services.

A detailed response to each of the Committee's recommendations (other than recommendation 13, which is directed to the government) is provided in the Annex below. These highlight the breadth of the work I am doing to fund and otherwise support such services. They also update you on the Women's Policy Summit I held recently.

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Thank you again for your work on this issue and for sharing your recommendations with me.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Sadiq Khan', with a small '2' written below the 'h'.

Sadiq Khan
Mayor of London

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Annex

Mayor of London's response to the recommendations of the London Assembly Housing Committee's report *Women and housing: a gap in the market*

Recommendation 1

The Mayor should expedite plans to deliver his manifesto commitment to launch a cross sector policy forum to coordinate efforts to advance gender equality. The Mayor should ensure that the forum specifically addresses issues pertaining to women, along with other, often intersecting protected characteristics such as disability, race and LGBTQ+, in housing policy, as a priority workstream and carries out work to improve data collection on these issues. The Committee recommends that the forum should be established within the next six months.

Since the publication of your report, the Mayor has held a Women's Policy Summit. This took place in City Hall on 6 March 2023.

The summit engaged with stakeholders in the women's sector. It addressed issues around gender equality including housing, the cost of living crisis, skills and employment, as well as the challenges facing the women's sector. It looked at the intersection between gender inequalities and other protected characteristics, including disability, race and sexual orientation, in relation to housing and other issues.

Prior to this, in the summer of 2021, the Mayor commissioned the Women's Resource Centre to engage London's women and the organisations that represent them to produce a 'vision statement' giving an account of the inequalities that London's women and girls experience. This work informed [Building a Fairer City](#), the London Recovery Board's action plan to reduce the inequalities that drove the disproportionate impact of the pandemic on particular groups of Londoners, or were created by it.

In November 2022, the Mayor published his revised [equality, diversity and inclusion objectives](#). These include provision for tracking the impact of policies.

Recommendation 2

The Mayor should review London Living Rent and consider changes to the rent setting policy to have regard to the gender pay gap, for example whether some rents could be set at women's median incomes rather than general median incomes.

The Mayor's approach to setting rent benchmarks for London Living Rent homes is in line with a commitment in his 2016 manifesto: to deliver "a new type of home for people struggling to rent privately, where rents are based on one third of average local wages".

London Living Rent is a form of intermediate housing, intended for Londoners who are unlikely to secure social rented housing but struggle to secure housing that meets their needs on the open market. As such, it has a role to play in meeting the housing needs of women, whose lower incomes mean that they are more likely to be in this position.

Seeking to tailor the product to better meet women's needs by, for example, setting some rents with reference to a third of women's average local wages, may seem a positive step in principle.

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However, implementing this approach raises an array of difficult questions and presents multiple practical challenges, outlined below.

- The rationale for offering some London Living Rent homes with lower rents, set with reference to women's average incomes, arguably mandates an equivalent approach for other groups of Londoners who have lower incomes – for example, those from Black and ethnic minority backgrounds. This, in turn, raises further questions: for example, how to approach rent setting for those from multiple groups who have below-average incomes (for example, women from Black and ethnic minority backgrounds), and whether it is fair to charge lower rents to individual women who have incomes above the average for all London Living Rent tenants.
- These questions suggest that, ultimately, the logic for setting different rents for those with particular characteristics, or combinations of characteristics, could point to a personalised rents model, potentially like the government's aborted "pay to stay" proposal for council tenants. This model is onerous to implement. It can also have multiple unintended consequences, such as creating a perverse disincentive for tenants to increase their incomes.
- Even a simpler approach, whereby some London Living Rent homes were let to women at lower rents, would be administratively burdensome for landlords to operate.
- Setting lower rents for some London Living Rent homes would create additional uncertainty for providers about rental income, which may adversely affect viability. If a certain proportion of homes were ring-fenced for women, this might create delays to letting homes. If developers did not know what proportion of London Living Rent homes they planned would be let to women, at lower rents, it would be difficult for them to reliably predict rental yields.
- Providers would need to determine whether to adjust rents for female tenants who, for example, were single at the start of their tenancy but acquired a male partner during its course.

The need to address these questions and challenges would risk disincentivising providers from providing London Living Rent homes. That outcome would have an adverse impact on the delivery of new intermediate housing, to the detriment of women and other groups of Londoners whose lower incomes mean that they need this type of affordable housing.

Recommendation 3

Where possible, the Mayor should work with local authorities, charities and housing associations to increase the provision of women-only accommodation that is of high quality, particularly for women who have experienced domestic abuse, homelessness, are leaving prison, or who otherwise need specialist support. Other groups, such as LGBTQ+ people, young people and those leaving care, or those with low-level support needs, should also have their needs taken into account.

The Mayor funds accommodation specifically for women with particular support needs, including women who have experienced domestic abuse and rough sleeping, primarily through his supported and specialist housing programmes. These programmes are open to local authorities and housing associations, who may work with charities to provide support services in the accommodation the mayor funds. Examples include the following:

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- Through his **Rough Sleeping Accommodation Programme 2021-24**, the Mayor has funded a project that provides six homes for women who have a history of rough sleeping and have previously been in accommodation that offers more intensive support. He awarded St Mungo's £155,788 to provide the support to the women living in this project up to 31 March 2024. This includes specific support for women who have been victims of domestic abuse, as well as support around physical and mental health, education, employment and training opportunities.
- Through his **Move-on Programme**, the Mayor has provided the following funding to Solace Women's Aid to deliver floating support services for survivors of domestic abuse:
 - £749,600 to deliver the CASA Project, a partnership of members of the Violence Against Women and Girls (VAWG) Consortium, which includes six 'by and for' support providers – that is, providers run by and for those from the communities they serve. The CASA Project provides floating support for survivors of domestic abuse, covering 63 units of accommodation delivered by a range of registered housing providers. It offers clients culturally sensitive resettlement throughout their tenancies, with a focus on tenancy sustainment, ongoing support for recovery, and moving towards independent living.
 - £183,596 to deliver a service for survivors housed in 10 dispersed, self-contained homes provided by L&Q. Eight of these are for people with children who are moving on from a refuge. The other two are for L&Q tenants fleeing domestic abuse.
 - £106,798 to deliver a service for survivors of domestic abuse housed in an eight-home scheme in Enfield, provided by Newlon Housing Association. Solace will provide two years' support to women leaving refuges who have ongoing support needs.
- In 2022, **Community Led Housing London**, which is funded by the Greater London Authority (GLA), provided early-stage revenue funding to London Older Lesbians Cohousing (LOLC). This group of lesbians aged 50 and over is working on a mutually supportive cohousing project that aims to future proof homes for the group's changing needs. Community Led Housing London continues to support LOLC in its search for opportunities to develop homes.
- Through commissioning to implement his [Domestic Abuse Safe Accommodation Strategy](#), the Mayor works with local authorities and charities to fund a range of support for survivors of domestic abuse and their children in safe accommodation. This includes, but is not limited to, refuge provision, move on support, specialist support workers, floating support, counselling support, and outreach services.
 - The government funding the Mayor received to meet duties created by Part 4 of the Domestic Abuse Act 2021 totalled over £20m for London in 2022/23 and £21.1m for each of 2023/24 and 2024/25.
 - In 2021/22, the Mayor grant-funded 21 London boroughs and nine service providers to enable them to continue domestic abuse safe

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accommodation services previously directly funded by the government. He continued funding these services in 2022/23.

- The Mayor also created a commissioning framework, which consists of service providers selected to be able to seek funding for services the Mayor is funding.
 - In March 2022, he allocated c.£11.5m to providers on that framework for services that would meet needs identified in his Domestic Abuse Safe Accommodation Strategy. The contracts for these services ran for 13 months.
 - The framework has a focus on encouraging 'by and for' providers, to ensure that the specific needs of Black and minoritised survivors and others with specific needs are met. The Mayor used an innovative approach of having a specific procurement 'lot' for these providers.

The Mayor makes funding for specialist housing available through his Affordable Homes Programme 2021-26, as well as through his specialist and supported housing programmes, such as those identified above. Currently, these programmes include:

- his Care and Support Specialised Housing Programme for older and disabled people's housing
- his Single Homelessness Accommodation Programme for rough sleepers with significant support needs and young people who are experiencing or facing homelessness
- his Domestic Abuse Safe Accommodation Programme
- his Community Housing Fund. The government has not provided further funding for this programme beyond the initial allocation for the launch of the fund in January 2019 and the Mayor has urged it to do so.

The Mayor strongly encourages providers to identify women-only accommodation that could be funded through these schemes. His housing team will support providers pursuing funding.

The Mayor has also funded some specialist accommodation for other groups through his **Life Off the Streets programme**, through which he funds services for rough sleepers, as follows:

- **The Youth Hub:** This service, provided by [Depaul UK](#) and [New Horizon Youth Centre](#) offers accommodation and specialist support to young people who are currently sleeping rough, as well as those who have been identified as at immediate risk of doing so by the London Youth Gateway, a coalition of youth homelessness charities. It received £196,876 in 2022/23.
- **The Outside Project:** This service aims to develop safe accommodation for vulnerable, homeless people who are LGBT+, to prevent or stop them from sleeping rough. It has recently moved into a new site, Anira House, where it will provide accommodation for up to six months, with staff onsite offering tailored therapeutic support focussed on recovery and move on. The service received £104,000 in 2022/23.

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Recommendation 4

The Mayor should work with local authorities to develop new standards to ensure consistency of service provision across London, and ensure that housing officers understand women's legal entitlements to housing, particularly relating to domestic abuse.

Local authorities are already subject to a number of standards in relation to housing and homelessness, some of them statutory obligations. These include relatively new requirements that create entitlements for women. For example, the Domestic Abuse Act 2021 created new obligations for social landlords offering a new tenancy to a survivor of domestic abuse obliged to leave a social rented home where they had a lifetime tenancy because of abuse, to ensure that the new tenancy is also a lifetime tenancy. It also added survivors of domestic abuse to those local authorities must treat as "in priority need" under the homelessness legislation, meaning that they are obliged to secure accommodation for them. The Mayor welcomed both of these changes, but ensuring local authorities meet them is outside his remit. However, he can and does play an enabling role: his work to support the delivery of more social rented homes and to fund support in safe accommodation for victims of domestic abuse will help local authorities to meet these standards.

In other areas, the Mayor is working with local authorities and other partners to improve and coordinate housing and homelessness services that are for women, or disproportionately used by women.

First, in relation to his responsibilities for support for survivors of domestic abuse in safe accommodation, the Mayor has created a multi-agency London Domestic Abuse Safe Accommodation Partnership Board, which advises and supports him on implementing his duties. This Board, which includes representatives of London boroughs, is reinforced by four implementation groups. The Board and its implementation groups focus on London-wide coordination of work to support survivors of domestic abuse and their children, including developing best practice standards and guidance.

The second area in which the Mayor is seeking to coordinate and improve services is his work to tackle rough sleeping in London:

- Last year, the **Life Off the Streets Executive Board**, which is jointly chaired by the Deputy Mayor for Housing and Residential Development and London Councils, established a new 'Ending and Preventing Women's Rough Sleeping' sub-group. This sub-group is co-led by GLA officers and London Councils staff, who are working in partnership with local authorities, health, domestic abuse, homelessness, women's and other specialist organisations. It has created a shared work plan that provides a strong framework to improve the rate at which women sleeping rough are identified and to ensure that there are services available to them that understand and meet the particular support needs they may have.
- The Mayor recently supported a **Women's Rough Sleeping census**, the first of its kind. This exercise was carried out by street outreach services, using gender-informed outreach shifts, in the autumn of 2022. The report resulting from the census, '[Making Women Count](#)', was launched by the Deputy Mayor for Housing and Residential Development on 9 March 2023. The Mayor's Rough Sleeping team is currently working with specialist women's organisations, including Solace Women's Aid, to implement the report's recommendations. Together, they are exploring how to expand the locations in which people are counted as sleeping

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rough, to include places where women often seek refuge from the dangers posed by sleeping visibly on the streets. The team is also enabling more specialist women's services to access the Combined Homelessness and Information Network (CHAIN) system used by rough sleeping services, to record the women they see sleeping rough. In combination, these changes will help to ensure that women are more accurately represented in data on rough sleeping in London.

- One of the cross-cutting priorities of the **Mayor's Rough Sleeping Commissioning Framework** is to ensure "that services are genuinely adaptive to all people who sleep rough, considering age, gender, race and other characteristics, and including those with more specialist needs." The Mayor aims to ensure that all his rough sleeping services adopt a gender-informed approach and can respond effectively to the specific needs of women. One of the roles of the recently-established Ending and Preventing Women's Rough Sleeping sub-group will be assessing whether these services are achieving that.

Third, the Mayor is supporting a range of work to improve the quality of the temporary accommodation that local authorities secure for households to whom they have a duty under the homelessness legislation. Single parent families, where the parent is most often female, are heavily represented among households in this accommodation, so the work is especially important in improving women's experience of housing and homelessness services. This work encompasses the following:

- The Mayor's London Housing Panel identified temporary accommodation as one of its three priorities. It is working with boroughs and London Councils to launch a pilot scheme to facilitate constructive, trauma-informed conversations between borough housing officers and people who have experience of living in temporary accommodation. It is also working to improve digital connectivity for households in temporary accommodation, working with Good Things Foundation.
- The Mayor funded the creation of and continues to support Setting the Standard, a local authority-led service to inspect and grade all bed and breakfast and studio properties used by local authorities to provide temporary accommodation.

Recommendation 5

The Committee has previously recommended that the Mayor call on the Prison Service to introduce a process to refer women at risk of homelessness on short sentences to local authorities at the commencement of their sentence, or as soon as possible after they enter prison. This would better enable the local authority to conduct a needs assessment and identify suitable accommodation for the day of release. In response, the Mayor stated this was being explored by the London Blueprint Delivery Group on Housing and Accommodation. The Committee requests that the Mayor provides an update on all aspects of this work that relate to the earlier recommendations, and also that he commits to starting implementation within the next six months.

The "duty to refer" that forms part of the Homelessness Prevention Act 2017 and applies to prisons is intended to facilitate such referrals.

Since 2018, the Mayor has commissioned services in London for women in prison, on probation and at risk of offending, which are overseen by the Blueprint Delivery Group. These services offer a holistic model of wrap-around, gender-specific support and have been delivered by Advance Minerva and Women in Prison.

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- Since 2021, this provision, called the London Women in the Criminal Justice System, has been extended to the whole of London through a co-commissioning arrangement with London Probation. It continues to work with London women in prison in the pre-release period, including providing 'through the gate' housing support. This includes making referrals to local authorities at the appropriate time, with special timescales for urgent support for women who are given short sentences and/or have little time before release. The timing of these referrals will depend on when information about release dates and needs is available and the relevant local authority's referral protocols.
- From December 2022, it has been re-procured with funding from a partnership of the Mayor's Office for Policing and Crime (MOPAC), London Probation, NHS England and Lambeth Council. The specialist in-prison housing resource for London women has been made a permanent part of this model, along with additional support with housing 'through the gate'. This service now includes support for all women on remand at HMP Bronzefield under the new Prison and Probation Service model for support for women on remand/without a sentence. This model, which includes a specific strand for housing, is being implemented for the first time at HMP Bronzefield. Outcomes, which include measurable outcomes related to housing after release, will be tracked 'through the gate' as part of this service.

Through the Blueprint Delivery Group, MOPAC officers have worked also with the Safe Homes for Women Leaving Prison Initiative and partner agencies to produce the Women's Prison Release Practice Briefing. This is a unique resource for agencies not only in London, but across England and Wales, that seeks to improve accommodation outcomes for women leaving prison. Giving an overview of factors to be aware of when commissioning or delivering services to women in the Criminal Justice System, it explains why a distinct gender-specific, trauma-informed approach is needed; sets out agencies' roles and responsibilities; and provides examples of good practice and governance. It is primarily aimed at commissioners, prison governors, prison resettlement leads, local authority housing teams, housing providers, police, probation practitioners, voluntary sector providers of specialist services for women, and government departments. The Mayor is also working with a local authority in London to explore options for additional dedicated accommodation that can be specifically ringfenced for women who have been affected by the Criminal Justice System.

Recommendation 6

The Mayor should work with local authorities to consider ringfencing a portion of accommodation for women with specific needs (including some women who may not otherwise meet priority needs' categories), including social, supported and temporary accommodation.

As outlined in response to recommendation three, the Mayor does a good deal to support the provision of accommodation that is specifically for women with particular needs, including needs related to surviving domestic abuse or having slept rough. Most of this is specialist and supported accommodation. As such, it is provided for a particular cohort, meaning there is no need to ringfence a proportion of the accommodation for that cohort.

The position in relation to social rented and temporary accommodation is more complex. The allocation of social rented accommodation is the responsibility of local authorities, which are required to establish allocation policies that are in line with Part 6 of the Housing Act 1996. Among other things, this means the policies must give "reasonable preference" to those in forms of

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housing need identified in this legislation, including those who have experienced homelessness (including but not limited to those in “priority need” categories in the homelessness legislation), those living in insanitary or overcrowded homes, and those who need to move on medical or welfare grounds, or to avoid hardship. Some local authorities choose to incorporate quotas for different groups. However, it is right that local authorities determine whether this approach is appropriate in their areas, in view of local needs, social housing stock and supply.

Similarly, the homelessness legislation clearly stipulates the criteria that mean a local authority must secure accommodation (which often means supplying temporary accommodation) for a household experiencing homelessness. The allocation of temporary accommodation differs from the allocation of social rented accommodation insofar as there is not a fixed supply of temporary accommodation. Local authorities are expected to secure accommodation for this purpose in line with the number of households whom they assess are entitled to it. Given this, it is unclear what benefit there would be in setting quotas for women. It is the case that many of the households for whom local authorities provide temporary accommodation are single parent families, in which the parent is a woman.

While it would not be appropriate for the Mayor to intervene in local authorities’ allocation of forms of accommodation that they are required to allocate in line with legislation, the Mayor’s work can help local authorities to meet those obligations. His use of both his planning policies and his Affordable Homes Programmes to increase the supply of social rented homes enables local authorities to allocate homes to more of the Londoners who need them. His Right to Buy Back programme assists local authorities to provide decent, local, affordable homes to households to whom they have a duty under the homelessness legislation. And his work to meet his duties under Part 4 of the Domestic Abuse Act will improve the options available to local authorities seeking accommodation for those made homeless by domestic abuse. Local authorities will be able to secure accommodation with specialist support for more survivors, rather than placing them in generic temporary accommodation.

Recommendation 7

The Mayor should work with local authorities to deliver support to women in need of housing, such as tenancy guarantees and help finding longer term housing. The Mayor should support local authorities to develop clear and detailed communications to women on housing waiting lists who are being discharged into the Private Rented Sector.

Local authorities have statutory duties to households facing or experiencing homelessness under the homelessness legislation, with a focus on preventing or relieving homelessness wherever possible, rather than placing households in temporary accommodation. Because of the shortage of social rented housing, this often entails securing private rented accommodation. Local authorities are also subject to requirements related to the management and standard of private rented accommodation that they secure in the course of exercising these duties.

The Mayor does not have the remit or the resources to directly assist local authorities with meeting their duties. However, he has repeatedly urged the government to ensure that local authorities are adequately resourced to meet their duties, including taking account of the additional costs of doing so in London. He also supported local authorities’ early work to create Capital Letters, through which they collaborate to procure private rented accommodation for homeless households. The Mayor also worked closely with local authorities to improve management and conditions in private rented sector accommodation. His [Rogue Landlord and Agent Checker](#), [Report a Rogue](#)

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[Landlord or Agent](#) and [Property Licence Checker](#) are valuable tools both for local authorities and for tenants experiencing difficulties in private rented accommodation.

More generally, the Mayor is using his powers, resources and influence to create a context in which Londoners are less likely to face homelessness and local authorities will be better placed to assist those who do. This includes urging the government to ensure that welfare benefits intended to cover housing costs are sufficient to cover rents (especially after recent steep increases) and to make good on its commitment to end 'no-fault' evictions through Section 21 of the Housing Act 1988. It also involves using his planning policy and his Affordable Homes Programme to increase the supply of much-needed affordable homes.

Recommendation 8

The Committee recently wrote to the Mayor outlining how he could reduce overcrowding in London, including increased provision of family sized homes. While the Mayor stated that he was already using his full suite of powers regarding overcrowding, he did not respond to the specific suggestions set out by the Committee. Given the urgency of the evidence submitted to this investigation, the Committee recommends that the Mayor revisit these recommendations.

In response to the Housing Committee's letter of 11 March 2022, the Mayor explained that he is "...using the full suite of [his] powers and the levers at [his] disposal to tackle this urgent issue," and noted that he and "...borough partners can only do so much to tackle overcrowding without the right policies and support from the government." This remains the case.

Recommendation 9

The GLA planning team should prioritise safety as part of its London Plan Supplementary Planning Guidance on design. It should consult with Londoners, particularly women in London, on what design features would enable women to feel safer in their homes.

London Plan 2021 Policy D5 Inclusive Design seeks to ensure that new developments are safe and reflect the highest standards of inclusive design. The policy sets out inclusive design considerations and the need to consider these in the early stages of the development process. It requires that Inclusive Design Statements (to be submitted as part of Design and Access Statements for major applications and smaller applications relating to Conservation Areas and World Heritage Sites) demonstrate the use of best practice and design guidance, engagement with equality groups and potential impacts, and how access and inclusion will be managed and maintained.

Forthcoming London Plan Guidance on Housing Design refers to safety considerations at different times of day, while London Plan Guidance on Optimising Site Capacity refers to appropriate building height-to-street ratios to maximise daylight and sunlight to dwellings and in public realm.

The recent Mayoral publication on [Women, Girls and Gender Diverse People: Safety in Public Space](#) provides boroughs and planning applicants with tools to embed safety and inclusive design considerations into proposals early on. These include inclusive design checklist questions, in which question six encourages co-designing with women and question seven supports gender-informed design features.

The Mayor's London Review Panel is also mainstreaming gender inclusion into the design review process. For example, the Mayor's Design Advocates are working across 10 projects, exploring with

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partners how to embed principles of gender safety. Lessons will underpin guidance for the development community, and inform the Mayor's approach to investment and planning decisions.

Officers are in the early stages of updating London Plan Guidance surrounding accessibility and inclusivity in the built environment, to support the implementation of various London Plan policies and to further promote equality considerations within our city. This is expected to provide more detail on accessible, inclusive design principles and minimum requirements for referable applications.

The Mayor recently called for the government to provide national inclusive design standards (for example, in relation to design standards on lighting/street lighting), as well as wider planning policy to improve the safety of women, girls and gender diverse people, and guidance to support implementation.

The Planning for London programme, which is gathering Londoners' views for any future review of the London Plan, includes targeted engagement with a representative group of Londoners who reflect the diversity of the wider population. It will also include targeted conversations to understand the views of those with a range of lived experiences. This will help to ensure their needs are understood and reflected in policy making.

Recommendation 10

The Mayor should extend the commitment in the Domestic Abuse Safe Accommodation Strategy that his 'commissioning processes and requirements do not disadvantage small, specialist and 'by and for' providers, and support capacity-building', to all housing services commissioned by the Mayor.

Besides the commissioning he undertakes to implement his Domestic Abuse Safe Accommodation Strategy, the Mayor's other housing-related commissioning takes place through his Life Off the Streets programme, which funds services to tackle rough sleeping.

The Mayor's Rough Sleeping Team shares a commitment not to disadvantage small, specialist and 'by and for' providers. When commissioning services, the team seeks to ensure it engages the full breadth of the potential market. The team recognises that it does sometimes specify that the provider should be of a minimum size, where it will need to deliver an extensive, London-wide service. However, it encourages potential providers to consider whether working in partnership with other organisations could help their service to deliver more specialist support for certain groups. Many of the services it commissions include aspects that are sub-contracted to a smaller provider. The team does also complement its commissioned services with grant funding for smaller projects and services, which are often delivered by smaller providers.

Recommendation 11

The Mayor should implement an improvement process for commissioning housing services. The Mayor should seek feedback from the organisations that the GLA commissions housing services from, on how interaction with the GLA could be streamlined to inform the improvement process. This should begin within the next six months.

It is unclear from the Committee's report what it considers should be the scope and focus of any improvement process. Indeed, the previous recommendation indicates that the Committee commends the approach to commissioning to implement the Mayor's Domestic Abuse Safe Accommodation Strategy, for seeking to support small, specialist providers. The response to

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recommendation 10, above, makes clear that the Mayor's Rough Sleeping Team shares this aim in administering the Life Off the Streets programme.

The Mayor's Rough Sleeping Team always seeks to make its commissioning processes as open and accessible as possible. It seeks feedback from the market on any improvements that could be made and acts in response to suggestions. For example, it introduced early market engagement, to ensure that invitations to tender incorporate good practice suggested by potential providers. It also seeks feedback from providers following a tender process.

It is also worth noting that the Mayor does not usually have a free hand in the design of the funding programmes he runs. Where funding comes from the government, he may need to work in line with its requirements and timetable. One example of this is where, in implementing his Domestic Abuse Safe Accommodation Strategy, the Mayor has wanted to fund services that will run over several years, but has not been able to, because the government only funded the first two allocations of funding to the GLA and other authorities one year at a time.

Recommendation 12

The Mayor should request the Government where possible to consider recommendations from Solace Women's Aid to exempt domestic abuse survivors from the benefits cap, to lift the local housing allowance to at least 50 per cent of the median for the area, and to increase benefits in line with inflation. The Mayor should urge the Government to establish how to best support women who are not survivors of domestic abuse, yet are not also able to access safe and secure housing.

The Mayor has consistently urged the government to return Local Housing Allowance rates to median market rents, to ensure that they are regularly updated in line with rental inflation, and to scrap the Benefit Cap. He considers these measures more pressing than ever in the context of recent steep increases in private sector rents in London.

The Mayor believes that all Londoners who have low incomes should receive the help they need to have a home they can afford. Therefore, he has not called for differential benefit rates or exemptions from the Benefit Cap for groups such as survivors of domestic abuse, but also refugees, care leavers, former rough sleepers, or others who have experienced homelessness. Such exemptions would be difficult to define and implement, with potential unintended consequences. For example, survivors of domestic abuse might find themselves required to recount experiences of abuse to DWP officials, in order to establish an exemption. An exemption for households to whom local authorities had accepted a full homelessness duty could create a perverse incentive for households to secure assistance from local authorities under the homelessness legislation, while also making it harder for local authorities to prevent homelessness – to the detriment of households facing homelessness. Moreover, if exemptions were time-limited (for example, applying for a number of years after, say, leaving care, securing refugee status, or securing assistance from a local authority under the homelessness legislation), this could create a cliff-edge, whereby exempt households faced a renewed threat of homelessness when the exemption expired.