

Domestic Abuse Safe Accommodation Strategy Refresh 2025-28

Consultation response report

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CONTENTS

Introduction and Background	2
Purpose and structure of the report	2
The Domestic Abuse Act 2021 and the scope of the Mayor's powers	2
Refreshing the Mayor's 2021-24 Domestic Abuse Safe Accommodation Strategy	4
Needs assessment summary	4
Pre-Strategy consultation engagement	5
Themes identified	6
Draft 2025-28 strategy publication and consultation process	7
Responses to the online survey	7
Processing online consultation responses	8
Combining the qualitative responses into themes	8
Domestic Abuse Safe Accommodation strategy consultation responses: Summary view	10
Survey responses: Table view of multiple-choice questions	10
Summary of response to multiple choice questions	12
Qualitative feedback captured from respondents online and through workshop engagement	13
Response to the consultation feedback	17
Summary response	17
Responses to specific suggestions arising from the consultation	18

Introduction and Background

Purpose and structure of the report

This report provides a summary of responses to the consultation on the Mayor's draft Domestic Abuse Safe Accommodation Strategy refresh for 2025-28. It sets out a summary response by the GLA and MOPAC, followed by individual responses to consultation suggestions. Changes and clarifications recommended by the GLA and MOPAC are set out.

The Domestic Abuse Act 2021 and the scope of the Mayor's powers

The GLA, as the Tier One authority in London, has duties under Part 4 of the Domestic Abuse Act 2021¹ to support victims/survivors of domestic abuse and their children in relevant safe accommodation. These duties include:

- assessing the need for domestic abuse support in safe accommodation across London
- preparing and publishing a strategy for the provision of this support
- giving effect to the strategy – that is, commissioning the provision of support to meet the identified needs
- monitoring and evaluating the success of the strategy
- convening a partnership board to advise on the exercise of the above duties.

The Mayor's Domestic Abuse Safe Accommodation strategy links to wider work that the Mayor delivers on domestic abuse across London and to ambitions beyond this Duty's scope. The DASA strategy includes references to the Mayor's VAWG² strategy, his Housing Strategy³ and the Greater London Authority's match funding of capital funding to the Part 4 Duty revenue (an independent innovation outside the Duty which itself places no requirement for Authorities to provide buildings or units⁴). Part 4 of the 2021 Act and the duties discharged under it remain specific and limited to the provision of domestic abuse support to meet the needs of victims/survivors within relevant forms of safe accommodation as defined by MHCLG⁵. These are:

- Refuge accommodation
- Specialist safe accommodation
- Dispersed accommodation

¹ [Domestic Abuse Act 2021 \(legislation.gov.uk\)](https://legislation.gov.uk/ukpga/2021/32/contents)

² [The Mayor's Violence Against Women and Girls Strategy 2022-25 | London City Hall](#)

³ [London Housing Strategy | London City Hall](#)

⁴ london.gov.uk/sites/default/files/2024-02/DASAH_Prospectus_2024.pdf

⁵ [Domestic abuse support within safe accommodation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/domestic-abuse-support-within-safe-accommodation)

- Sanctuary schemes
- Second stage accommodation
- Other forms of domestic abuse emergency accommodation, defined as *‘A safe place (single gendered or single sex, secure and dedicated to supporting victims of domestic abuse) with domestic abuse support tied to the accommodation to enable victims to make informed decisions when leaving a perpetrator and seeking safe accommodation. For example, short term (e.g. 2-3 weeks) accommodation providing victims with the space and safety to consider and make informed decisions about the options available to them.’*

MHCLG guidance⁶ provides further specific information on accommodation types in full under these categories. The MHCLG guidance also provides further detail on the types of support that can be delivered in relevant safe accommodation under the Part 4 duty. London boroughs (tier 2 local authorities) have a duty to cooperate with tier one authorities in exercising their functions under Part 4 and further details of this are set out within the government guidance.

⁶ [Delivery of support to victims of domestic abuse in domestic abuse safe accommodation services - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/674441/Delivery_of_support_to_victims_of_domestic_abuse_in_domestic_abuse_safe_accommodation_services_-_GOV.UK.pdf)

Refreshing the Mayor's 2021-24 Domestic Abuse Safe Accommodation Strategy

The Mayor's first Domestic Abuse Safe Accommodation (DASA) strategy in 2021⁷ is being refreshed for 2025-28, following an updated London-wide needs assessment conducted by Crest Advisory concluding in March 2024. This can be read in full in conjunction with this consultation report.

Needs assessment summary

In summary, the needs assessment included in-depth consultation with stakeholders and victims/survivors alongside the quantitative analysis of seven key datasets to create as complete a data picture as possible. Currently, across London, there is no single source of data for unmet demand and provision of safe accommodation-based support available. This is due to the differing data recording processes and funding streams of boroughs, providers, organisations and agencies (both statutory and non-statutory) involved in delivering support and services to victims/survivors across London. Key datasets analysed included;

- **MHCLG Homelessness** - Case Level Collection (H-CLIC): This dataset reflects statutory homelessness statistics, providing information about those who local authorities have a duty to accommodate due to homelessness.⁸
- **Mayoral commissioned services** – services commissioned by the Mayor under the Part 4 funding in 2022/23
- **The Combined Homelessness and Information Network (CHAIN)** - CHAIN is a multiagency database that records information about rough sleeping in London.⁹
- **Pan London Housing Reciprocal (PLHR)** - The PLHR scheme was funded by MOPAC and delivered by Safer London between 2017-2024, to offer an alternative housing pathway for those holding a social housing tenancy who are also at risk of violence in their borough¹⁰
- **Local authority survey** - 21 London boroughs contributed to a survey by Crest Advisory aligned to the standardised MHCLG data collection form, capturing data spanning 2020-2023 on DASA support provision.

⁷ [Domestic Abuse Safe Accommodation Strategy | London City Hall](#)

⁸ [Homelessness statistics - GOV.UK \(www.gov.uk\)](#)

⁹ [CHAIN | Homeless Link](#)

¹⁰ [The Pan-London Housing Reciprocal: Three Years On - Safer London](#)

- **Routes to Support** - Routes to Support is the UK-wide online Women's Aid database for domestic abuse and other VAWG services. It provides details of available refuge provision for women and children.¹¹
- **On Track provided by Women's Aid** - On Track is Women's Aid's case management and outcomes measurement system which is used by 100+ domestic abuse organisations and providers. This needs assessment used On Track data, including services in London.¹²
- **Published datasets** - Datasets utilised include the Crime Survey of England and Wales (CSEW)¹³, police recorded crime on where crimes have been reported to and recorded by law enforcement agencies from all police forces nationally and the Metropolitan Police dashboard.

The Crest Advisory research team collaborated with voluntary and community sector (VCS) organisations to interview with practitioners and victims/survivors. A diverse range of stakeholders relevant to the DASA landscape were engaged through over 40 interviews with representatives of the statutory bodies as well as the voluntary and community sector and 8 victims/survivors. A further victim/survivor survey launched received 40 responses. Crest held workshops with VAWG coordinators and VCS organisations to develop key recommendations.

The draft strategy also reflects relevant commitments contained in the Mayor's Police and Crime Plan¹⁴, Violence Against Women and Girls (VAWG)¹⁵ strategy and the London Housing Strategy¹⁶. These strategies were themselves subject to public consultation and equality impact assessments.

Pre-Strategy consultation engagement

The content of the refreshed draft strategy was informed by further separate engagement with stakeholders and victim/survivors in February-March 2024, led by MOPAC. A proportionate approach was taken, that focused on updating the DASA strategy objectives and content for 2025-28, while retaining the Mayor's vision set out in the existing strategy. This vision is that all victims/survivors of domestic abuse, including children, can access and be supported by safe accommodation-based services, tailored to their needs.

The pre-Strategy consultation engagement included:

- 4 workshops - 3 in person and one online - were held with agencies involved in tackling domestic abuse; and organisations delivering support. This included VCS and representatives of London boroughs, including housing representatives).

¹¹ [Routes to Support: Database on local domestic abuse services \(womensaid.org.uk\)](https://www.womensaid.org.uk)

¹² [On Track - Women's Aid \(womensaid.org.uk\)](https://www.womensaid.org.uk)

¹³ [Crime Survey for England & Wales](https://www.csew.gov.uk)

¹⁴ [London's Police and Crime Plan 2022-25 | London City Hall](#)

¹⁵ [The Mayor's Violence Against Women and Girls Strategy 2022-25 | London City Hall](#)

¹⁶ [London Housing Strategy | London City Hall](#)

- 5 group and individual discussion sessions were held with 8 victims/survivors
- London Domestic Abuse Partnership Board¹⁷ members undertook a pre-consultation engagement exercise

Themes identified

Eight themes were identified across engagement with organisations. These were for the strategy to:

- promote progress and communicate the strategy
- set out roles and responsibilities,
- encourage local coordination and partnership working
- reflect the operational context of the DASA landscape
- recognise the funding and resourcing challenges for providers
- address commissioning gaps and highlight the next set of priorities
- acknowledge strategic challenges
- acknowledge challenges to data reporting and collection.

The 8 victims/survivors provided reflections along three themes, that:

- support should assist with emergencies and crisis point
- support should help with rebuilding our lives
- support should help with 'managing the system' (such as navigating approaches to statutory services and knowing rights).

Alongside this, as part of regular MOPAC engagement, regular implementation groups chaired by partners from London Councils¹⁸ and Women's Aid¹⁹ provided a forum for ongoing reflections for the GLA and MOPAC to consider further in drafting the strategy.

¹⁷ [Domestic abuse safe accommodation and support | London City Hall](#)

¹⁸ [London Councils is the collective of local government in London | London Councils – Home](#)

¹⁹ [Home - Women's Aid \(womensaid.org.uk\)](#)

Draft 2025-28 strategy publication and consultation process

The public consultation for the refreshed Domestic Abuse Safe Accommodation Strategy 2025-28 launched on 4 October 2024 and ran until 10 December 2024. It was published on london.gov.uk.

The consultation format provided an online survey form developed with MOPAC's Evidence and Insight team that also provided further freeform text boxes for comments and reflections. An option to respond by email was provided.

Due to a technical fault the original closing date was extended until 10 December 2024 to enable all respondents to successfully submit. To promote the publication, MOPAC and GLA emailed a wide range of stakeholders inviting them to respond. They included those the 2021 Act specifies should be consulted on the draft strategy: including the Partnership Board, senior leaders and operational delivery representatives of boroughs in London and wider organisations from across domestic abuse services, including specialist 'by and for' providers. The draft consultation launch was also promoted on LinkedIn and X.

MOPAC held two online workshops during the period of the consultation. 31 borough and housing sector representatives, followed by 29 VAWG and wider voluntary and community (VCS) provider representatives attended to feed back their views on the draft strategy. VCS providers represented a mix of smaller, specialist and 'by and for' organisations, and larger providers. Workshops were attended by representatives with knowledge and expertise relating to the delivery of statutory and other council-led services, and those supporting a range of underserved groups of victims/survivors. The Partnership Board undertook an interactive engagement exercise on the draft strategy in October 2024.

GLA and MOPAC officers promoted the consultation throughout, via regular meetings and stakeholder forums. In other interactions with stakeholders at VAWG and Housing forums.

Responses to the online survey

The london.gov.uk website page was viewed 1,945 times and accessed by 996 users during the period of 4 Oct to 10 Dec 2024. 35 consultation responses were received – two more than for the 2021 strategy consultation.

The survey asked 9 different multiple-choice questions on how 'clear' and 'effective' key parts of the refreshed strategy and the needs assessment were. Each of these 9 questions had a further optional open-ended text box to allow for additional feedback.

25 responses to the online survey and 10 emails (containing freeform thoughts and views) were returned. Further to this, free text boxes under each multiple-choice question in the

survey were provided so that additional views or suggestions could be recorded. Local authorities, VAWG and wider VCS providers and other agencies and organisations delivering support responded to the consultation. No public responses to the consultation were returned.

Figure 1

Organisation type	Responses received (number)
Local authority	15
Dedicated VAWG voluntary and community sector provider	13
Registered social landlord organisation	3
Voluntary and community sector organisation (other)	2
Partnership organisation	1
Other	1
Private rented sector organisation	0
Commissioner	0
Organisation type not identifies	0
Total	35

Processing online consultation responses

GLA and MOPAC officers classified all 35 respondents (to the survey and by email) against the organisation categories in Figure 1 above. The consultation did not require respondents to submit their organisation name, to support open and honest comments from all. Submissions were anonymised for this report.

MOPAC's Evidence and Insight team reviewed the 25 responses provided to the multiple-choice survey questions. All qualitative information from the 35 responses returned online from across free text boxes and freeform email responses were also reviewed. These were then listed into summaries. Specific suggestions to MOPAC and the GLA that related to improving the strategy were separated out from a range of wider reflections and discussions.

Combining the qualitative responses into themes

MOPAC officers undertook further content analysis to combine notetakers' data from workshops and the Partnership Board with these summaries. Recurrent suggestions, reflections and views were noted across the data and to reduce duplication, data were further grouped into themes. Where comments related to the impact of the proposals on

those with characteristics protected by the Equality Act 2010, officers highlighted this to support a further cross-referencing and refining of the Equalities Impact Assessment (EQIA). Specific suggestions for MOPAC and the GLA relating to improving the strategy were listed in detail.

Domestic Abuse Safe Accommodation strategy consultation responses: Summary view

Survey responses: Table view of multiple-choice questions

There were 25 respondents that answered multiple choice survey questions. The most common response for each survey question is set out below.

	Extremely	Very	Effective/ clear	Somewhat	Not at all
1. Overall, is this an effective document that informs and supports DASA delivery?	0	4	8	11	2
12 responses agreed it was overall 'Effective' (includes effective, very effective and extremely effective) 11 responses believed it was 'somewhat effective' 2 responses believe it was 'not at all effective' 19 respondents followed up in the free text box					
2. Is the purpose of Part 4 funding under the Duty clear?	2	3	14	6	0
19 responses agreed it was 'Clear' (includes clear, very clear, and extremely clear) 6 responses believed it was 'somewhat clear' 15 respondents followed up in the free text box					
3. Is the role of the Mayor and the scope of his powers under Part 4 of the Domestic Abuse Act 2021 clear?	1	4	13	7	0
18 responses agreed it was 'Clear' (includes clear, very clear, and extremely clear) 7 responses believed it was 'somewhat clear' 13 respondents followed up in the free text box					
4. Is the Mayor's progress since 2021 in the implementation of the Part 4 funding clear?	0	3	13	7	2
16 responses agreed it was 'Clear' (includes clear, very clear, and extremely clear)					

<p>7 responses believed it was 'somewhat clear'</p> <p>2 believed it was 'not at all clear'</p> <p>15 respondents followed up in the free text box</p>					
5. Are the priorities set out by the Mayor for delivery partners to consider in 2024-27 clear?	1	3	10	10	1
<p>14 responses agreed it was 'Clear' (includes clear, very clear, and extremely clear)</p> <p>10 responses believed it was 'somewhat clear'</p> <p>1 believed it was 'not at all clear'</p> <p>15 respondents followed up in the free text box</p>					
6. Does the strategy set out victims/survivors needs that reflect your organisation's understanding of victims/survivors' needs in London?	0	1	11	11	2
<p>12 responses agreed it 'Effectively' reflected their understanding (includes effectively, very effectively, and extremely effectively)</p> <p>11 responses believed it 'somewhat effectively' reflected their understanding</p> <p>2 responses believed it 'not at all effectively' reflected their understanding</p> <p>19 respondents followed up in the free text box</p>					
7. Does the needs assessment set out victims/survivors needs that reflect your organisation's understanding of victims/survivors' needs in London?	0	0	8	11	4
<p>8 responses agreed it 'Effectively' reflected their understanding</p> <p>11 responses believed it either 'somewhat effectively' reflected their understanding</p> <p>4 responses believed it 'not at all effectively' reflected their understanding</p> <p>19 respondents followed up in the free text box</p>					
8. Does the strategy enable you to identify objectives, Mayoral commitments and activity that your organisation may be well placed to respond to in 2024-27?	0	2	11	9	3
<p>13 responses agreed it 'Effectively' enabled them to identify activity (includes effectively and very effectively)</p> <p>9 responses believed it 'somewhat effectively' enabled them to identify activity</p> <p>3 responses believed it 'not at all effectively' enabled them to identify activity</p>					

<i>18 respondents followed up in the free text box</i>					
9. Does the needs assessment enable you to identify gaps and needs that your organisation may be well placed to respond to in 2024-27?	0	4	10	10	1
<i>14 responses agreed it 'Effectively' enabled them to identify gaps/needs (includes effectively and very effectively)</i> <i>10 responses believed it 'somewhat effectively' enabled them to identify gaps/ needs</i> <i>1 response believed it 'not at all effectively' enabled them to identify gaps/ needs</i> <i>16 respondents followed up in the free text box</i>					

Summary of response to multiple choice questions

Most respondents (76%) said the purpose of the Duty, the role and scope of the Mayor's powers (72%) and evidence of his progress under the Duty (64%) were clear. 92% of respondents said that overall, the draft strategy is either an 'effective' document that supports their delivery, or is 'somewhat effective'.

Questions that related to how respondents saw their own role in delivering the Mayor's priorities and how effective the strategy document and needs assessment were in reflecting their understanding of victims/survivors' needs produced more mixed responses.

However, overall, respondents (96%) mostly said that that priority activity set out in the in the strategy was clear, or somewhat clear. and most (88%) could identify clearly where their organisation would be well placed to respond to it, or somewhat clearly. Almost all respondents felt that how the strategy (92%) and needs assessment itself (76%) set out victims/survivor needs and addressed gaps in provision effectively or at least somewhat effectively. Sentiment on the needs assessment may improve further on publication of the full needs assessment with a final version of the strategy, rather than a comprehensive summary that accompanied the draft.

A small group, 4 of 25 respondents, cited some 'not at all effective' responses, that related to specific elements of the strategy. Where 'not at all effective' responses were returned, one was from a 'by and for' specialist VAWG provider. Here, comments reflected a strength of feeling that VAWG is endemic. The respondent felt that both the needs assessment and the Part 4 funding itself are not enough to reflect or meet need in London. The respondent felt that Mayoral progress is not best represented through grant funding and favoured more leveraging by the GLA and MOPAC of Corporate Social Responsibility (CSR) programmes, financial and pro-bono arrangements.

3 local authorities also returned 'not at all effective' responses, with free text identifying an overall call for more on evidencing operational delivery planning, (one preferred a SMART goals approach within the strategy document), more on 'lessons learned' and on future commissioning, it was reflected by one local authority that more directive language should be used encouraging boroughs' DAHA²⁰ accreditation, along with better language regarding groups affected by domestic abuse. A further local authority cited a lack of data on older victims/survivors and on socio-economic status. A third local authority cited longstanding concerns with the GLA and MOPAC commissioning model to date, citing over-reliance on existing local authority funded provision, financial pressures on boroughs and the limitations of the strategy in addressing the disparity between boroughs' funding and investment in relation to the Duty.

Qualitative feedback captured from respondents online and through workshop engagement

This table sets out summary themes from all of the further qualitative views and suggestions captured in free text boxes and freeform email responses online, combined with notetakers' data from workshops and the Partnership Board interactive exercise.

Headline themes

Headline Theme	Description
1. Evidencing delivery	Many respondents identified that Mayoral vision and objectives set out a clear innovative vision, ambition and goals, and that the strategy sets out the Mayor's powers and scope well in alignment with the Part 4 Duty. One local authority respondent identified it as 'impressive.' Some respondents identified this refresh improved on the clarity of the last strategy and sets out largely the right priorities. However, some respondents called for clarity going forward on how impact will be delivered, with a focus on clarifying priority operational activity through SMART goals, KPIs or action planning. Some respondents called for more clarity on future commissioning planning and timelines – and on the funding and a breakdown of this available from 2025 onwards.
2. 'Lessons learned'	Some respondents cited that Mayoral progress was set out in an encouraging and useful summary that recognises that gaps in delivery still exist. However, others called for more on achievements and results to date since 2021, and more focus on the 'lessons learned' from what was not progressed or achieved in the last three years.
3. Data quality	Some respondents highlighted that the needs assessment and strategy effectively reflect victims/survivor needs and gaps in provision, and that it supports local understanding. Inclusion of data on multiply disadvantaged victims/survivors was welcomed. However, two respondents cited the wider evidence base should be more prominent in the strategy. Some respondents commented that data quality cited the limitations of identifying needs for particular groups (e.g older survivors,

²⁰ [What is DAHA Accreditation - daha - Domestic Abuse Housing Alliance \(dahalliance.org.uk\)](https://dahalliance.org.uk/)

	disabled survivors, children), or disaggregating data (e.g Black and Minoritised groups, those facing multiple disadvantage). It was noted by one that socio-economic breakdown of need was not included. It was also noted by one that underreporting by marginalised groups is likely for some sources (e.g police data). Respondents in this theme called for better data collection and monitoring mechanisms to track gaps in need, with better outcome and impact data.
4. Support for victims/survivors	<p>Some respondents welcomed the Mayor's focus on inclusion, psychologically safe spaces, unmet need and on children in the strategy. Some respondents noted that the strategy and needs assessment reflected key and diverse areas of need, with one noting that the strategy was 'trauma informed and psychologically aware.'</p> <p>However, a number of respondents identified particular groups or forms of need that they considered should be included in the strategy, or more strongly emphasised. Groups included: victims/survivors with insecure immigration status, women involved with the criminal justice system, multiple disadvantages, male victims/survivors, older and disabled victims/survivors; children and young people aged 18-24. Some respondents cited that more clarity on the role of move-on accommodation was required. Two respondents felt that specialist perpetrator support provision should be included in the strategy. One respondent advised that the strategy is limited in its ability to improve outcomes for migrant victim-survivors with no recourse to public funds. One respondent was concerned that 'by and for women's services' were not cited as specialist provision. One respondent cited that language should be improved relating to underserved groups that better reflected their experiences in the summary of the needs assessment.</p>
5. Partnership working	Some respondents noted they felt their organisation was well placed to respond to the strategy. One respondent said it was clear that a key role for the Mayor is convening wider partnerships throughout the DASA system. However, some respondents wanted more detail on how GLA and MOPAC will collaborate with all partners at pan-London level. Others highlighted that more direction should be provided on how partnership working should operate between boroughs and the VAWG sector.
6. Tier 2 authorities	Some respondents cited that the Mayor's role and the purpose of the duty is unambiguous and clear. Other respondents highlighted that the strategy should further outline the specific role and responsibilities of Tier 2 local authorities (boroughs in London).

Additional themes

Additional themes	Description
7. Refreshing Partnership Board	Some respondents in the free text data called for more clarity on how Partnership Board governance sits within the GLA and MOPAC wider structures and how it draws on views from other influential stakeholder groups.

	<p>Respondents in the Partnership Board exercise reported their views. Some respondents felt that the governance of the Board required more clarity, including escalation routes and how information flowed to the board from other stakeholder forums in GLA and MOPAC. One respondent felt the agenda was determined in a 'top down' way.</p> <p>Some respondents felt that more representation from senior borough Housing leadership at the Board would be beneficial and others said influential representatives from across the whole 'ecosystem' should always attend. Others noted that VAWG expertise must continue to lead the Board and that inviting too many attendees could dilute impact. One respondent suggested smaller action-oriented groups and sessions more regularly. Some respondents noted that communicating and cascading important information to all partners from the board should be reviewed.</p>
8. The scope of the Part 4 Duty	<p><i>To note: The Mayor, GLA and MOPAC officials work with the government to make the case for how the national Duty may be developed. Decision on the scope and function of the Part 4 duty and associated guidance, monitoring and data collection are the responsibility of the Ministry of Housing, Communities and Local Government (MHCLG).</i></p> <p>Some respondents said that the strategy's commitments to making the case for the Duty to better reflect victims/survivors with insecure immigration status are welcomed. Some providers cited that strategy commitments to seeking longer term sustainable funding as welcomed.</p> <p>While some respondents welcomed the change in rules to allow specialist support for victims/survivors and children placed in generic housing, there was concern from some respondents that widening the scope of the duty to include support provided in temporary accommodation may lead to adverse impacts. One respondent cited strong concerns. Respondents cited that this change in scope could be 'exploited' by 'unscrupulous' providers - and that this may dilute a commitment to driving for more safe accommodation provision overall.</p> <p>Some respondents reflected that meeting MHCLG reporting was a challenge for them. Some said that MHCLG 'bedspace' data categories were too limited and one respondent highlighted that safe accommodation definitions do not work for disabled victims/survivors. One respondent called for more focus on the quality of victims/survivor experience and another called for more leniency on the time it takes to mobilise support and build relationships with victims/survivors. Another asked that more regard be given to the interdependency of funding and the impact of multiple funder pressures have on the wider infrastructure.</p>

Wider reflections arising

While they could not be categorised as directly related to the improvement of content within the strategy, further respondent reflections on wider issues were captured below for transparency. All feedback will inform GLA and MOPAC's planning and engagement in 2025-28.

Funding cycles	While the focus of the Mayor on calling for long term sustainable funding was welcomed by some respondents, some respondents reflected further that current short term funding cycles had significant impact on how provision could be delivered. One respondent reflected that <i>'short funding cycles are devastating for smaller organisations'</i> . Another reflected that <i>'the greatest impact on the sustainability of the sector is short term funding.'</i> Another noted that long term settlements are needed with seamless grant renewal.
VAWG and housing landscape	Reflections were made that the wider issue remains that there is a lack of safe accommodation, and a shortage of housing across London. One respondent described all VAWG need in London as a whole as <i>'over the roof'</i> in terms of demand. One reflection was made that understanding of survivor's needs related to locations of safe homes is lacking and that it is concerning that victims/survivors may need to move long distances outside of London beyond their support networks

Response to the consultation feedback

Summary response

Overall, stakeholder feedback on the draft strategy has been largely positive with the Mayoral vision, objectives and direction of the strategy being endorsed by most respondents. The feedback gathered enables the GLA and MOPAC to refine, clarify and expand further on operational elements of the strategy. A summary of the recommended headline changes and clarifications is set out below.

Further clarity on key strategic milestones on future commissioning is helpful to update where possible at the time of publication. A phased approach to commissioning developed in collaboration with partners means that some milestones are in development and will be reflected through strategic engagement and further communication to partners in 2025. A specific delivery plan commitment can be highlighted for 2025-28, driven through a refreshed Domestic Abuse Partnership Board. This would demonstrate further the planning in rapid development to refresh City Hall's role in leading effective delivery of the Duty.

The strategy should add further emphasis on 'lessons learned' from the challenges of 2021-24, on elements such as the current Framework, and would benefit from highlighting more of the key operational work undertaken by the GLA and MOPAC.

We would expect concerns around data quality on domestic abuse to arise. As the updated needs assessment acknowledges upfront, and as is widely understood in the existing evidence base both in London and at national level, there is generally limited systemic data capture and utilisation on domestic abuse. Existing strategy commitments to continually improving future needs assessments and capturing wider evidence and data will be driven through delivery planning and the Partnership Board. It would be beneficial to add more explicitly that responding to all recommendations in the needs assessment (which includes addressing gaps in need) will form part of the Partnership Board and activity in 2025-28.

Further explicitness highlighting MHCLG guidance on the powers of the Mayor in relation to boroughs in delivering this Duty would be helpful. Highlighting the GLA's housing engagement at an operational level and the commitment to furthering this would be helpful to make more explicit.

Feedback also highlighted themes on the wider landscape of tackling VAWG, addressing wider housing and other issues and which go beyond the scope of changes and clarifications that could be made to this document. For example, mandatory oversight of

local boroughs' provision or wider housing delivery decisions for victims/survivors is both outside of the Mayor's remit and not set out within the Part 4 statutory guidance to deliver.

Feedback also included some concerns that victims/survivors with no recourse to public funds are excluded from the Duty. This reflects pre-Strategy engagement workshops where some attendees raised that the MHCLG guidance is not clear when it comes to supporting victims/survivors with no recourse to public funds (for example, in relation to providing temporary subsistence payments to destitute victims/survivors). The Mayor shares these concerns regarding the duty's scope and has communicated this with successive governments, since before the Domestic Abuse Act 2021 came into being. Mayoral commissioned services in London actively support victims/survivors with insecure immigration and GLA and MOPAC already take a specific focus on the provision of specialist support that benefits this cohort of survivors. The Mayor's DASA strategy at London level is explicit in its ongoing commitment to work constructively with national government to improve the legislation and guidance to clarify further how all victims/survivors, including those with no recourse to public funds and insecure immigration status, can be supported with Part 4 funding.

Feedback that was out of scope, that was better situated and addressed in a delivery plan for 2025-28, or provides wider reflections all remain valid and relevant. All feedback has provided detailed insight into the landscape that partners are working within. All qualitative feedback has been captured in detail to inform the GLA and MOPAC delivery plan and strategic engagement approach to commissioning in 2025-28.

Responses to specific suggestions arising from the consultation

All specific suggestions for changes, clarifications and amendments from the online and workshop free text data were re-aligned with themes arising from the content analysis. Where duplicate suggestions arose, these have been amalgamated. A GLA MOPAC response is provided to each with a rationale included for the identified response.

Headline themes

Theme 1 – Evidencing delivery suggestions	GLA and MOPAC response
1.1. Provide a delivery plan to accompany the strategy 1.2. Provide more on planned activities and how progress/outcomes will be achieved/measured	1.1, 1.2. Change: Already in development is a delivery plan for 2025-28. This delivery plan helps ensure the Mayor's vision and priority activity set out in the strategy is delivered in an effective, inclusive way that delivers value for money for Londoners - in a transparent manner. A final strategy should reference this rapidly developing work and how it will be communicated.

<p>1.3. Provide more detail on future commissioning, including timelines</p> <p>1.4. Ensure that any bidding process is open to the London Borough that were not previously granted funds</p> <p>1.5. Provide more detail on specific types of inclusive commissioning processes</p> <p>1.6. Include a Theory of Change Model in the document</p>	<p>1.3. Change: While the strategy already sets out that future commissioning beyond the initial grants programme will stem from a collaborative approach with partners throughout 2025-28, further key operational milestones could be provided where possible. Much of this information is best placed in the ensuing commissioning communication to partners planned following the strategy and in a delivery plan.</p> <p>1.4. No change: The communication and documentation (e.g. any prospectus) of future commissioning would be trailed following the strategy publication and should set out for specific mechanisms what the parameters are.</p> <p>1.5, 1.6. No change: The strategy already identifies that a grants programme for specialist services will commence in 2025 followed by in-depth engagement to develop proposals for further commissioning mechanisms that provide the right inclusive mix for London in 2025-28. Alongside the changes recommended at 1.1, this should adequately outline at strategic level the development of further commissioning and its key operational milestones. GLA and MOPAC officers will relay suggestions on developing a Theory of Change model / models to the Partnership Board, to aid delivery planning work.</p>
<p>1.7. Provide more detail on future funding</p> <p>1.8. Provide a breakdown of funding and how this will be distributed.</p>	<p>1.7. Change: Since the publication of the draft strategy for consultation closed on 10 December 2024, MHCLG have announced their allocated funding for 2025-26. This should be stated in the final strategy.</p> <p>1.8. No change: Further funding information will be provided as part of the iterative, collaborative commissioning approach set out in the strategy, as relates to each mechanism. Subject to confirmation from the government of further Part 4 funding beyond 2025-26, further funding will be made available to support priorities set out in the strategy.</p>
<p>1.9. The strategy is not clear enough on what safe accommodation is</p>	<p>1.9. Clarify: 76% of consultation survey responses agreed the purpose of the Part 4 duty was 'Clear' (includes clear, very clear, and extremely clear). A shorthand definition and example of safe accommodation is set out in the glossary. For completeness, MHCLG text regarding the full range of types of safe accommodation should be replicated in the final strategy text alongside the embedded link, in the 'scope of the Mayor's powers' section.</p> <p>More widely, the definition of safe accommodation is set by MHCLG at national level, not by the Mayor of London- and</p>

	<p>includes specific types of accommodation in their statutory guidance.</p> <p>Other more specific suggestions relating to the role of the Mayor in supporting MHCLG to improve the clarity of the national duty with regards to safe accommodation are responded to in Theme 8.</p>
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Theme 2 - 'Lessons learned' Suggestions	GLA and MOPAC response
<p>2.1. The strategy should show more on achievements to date, including information on how and to what extent proposals in the previous strategy have been delivered</p> <p>2.2. It should expand on learning from 2021-24</p>	<p>2.1, 2.2. Change: The strategy sets out the headline successes of delivery in alignment with statutory MHCLG reporting and as a 'highlights' section. A further reflection on the operational successes and challenges of 2021-2024 would be helpful. This section should highlight the re-commitment to further progress against the refreshed priority commitments with reference to developing a robust delivery plan. Pointing more clearly to the full version of the needs assessment publication and commitment to deliver on recommendations will be helpful.</p>
<p>2.3. It should be clearer who accesses this support and how</p>	<p>2.3. Clarify: For brevity, the strategy currently embeds in a footnote a link to MHCLG data tables on the breakdown of survivors supported in safe accommodation in London. This data should be highlighted for ease.</p>

Theme 3 – Data quality Suggestions	GLA and MOPAC response
<p>3.1. Revise the needs assessment methodology so that it can identify the gap in the proportion of services provided for Black and Minoritised women.</p>	<p>3.1-3.9. No change: Limitations in the needs assessment do not preclude bids for funding for support for particular groups of victims/survivors, or particular models or types of support, where they evidence meeting a need and are able to be delivered under the remit of the Duty.</p>
<p>3.2. Insights should be provided about older survivors of abuse</p>	<p>The needs assessment informs the strategy as set out under the Part 4 duty. It should not be revised but it is acknowledged as a statutory and key part of London's pan-London evidence base on domestic abuse, with recorded limitations inherent to the wide-ranging combined datasets and qualitative utilised, and a commitment to continual improvement.</p>
<p>3.3. More data about the number and characteristics of children needing support in safe accommodation.</p>	<p>It is acknowledged within the strategy and assessment that there is no complete dataset that provides a full picture of demand and need in London. The needs assessment and Equalities Impact Assessment for the programme is also clear on gaps in understanding and that demand across many groups is likely to be much higher.</p>
<p>3.4. Socio-economic status of victim-survivors should be acknowledged</p>	
<p>3.5. More detail on how multiple intersecting disadvantages compound</p>	

<p>impact on severely vulnerable groups over time. Multiple disadvantages create unmet needs that require longer lasting safe accommodation support services</p> <p>3.6. Trans individuals are disproportionately impacted by abuse but limited data</p> <p>3.7. The needs assessment and strategy should appreciate the needs of victims/survivors who have had involvement in the criminal justice system</p> <p>3.8. The need assessment should provide readers and the commissioning body with an idea of how many bedspaces or additional service are needed to ensure groups are supported</p> <p>3.9. 40 responses to the needs assessment victims/survivors survey are not representative of London</p> <p>3.10. The needs assessment would benefit from incorporating other existing evidence bases to identify gaps</p>	<p>Priority activity set out in the strategy continues to commit the Mayor, the GLA and MOPAC to work with partners <i>“...to explore and develop improvements to the collection and use of data, and information on the demand for services and survivors’ needs.”</i></p> <p>It also states a commitment to <i>“...ensuring learning from evaluations, pilots and service delivery are shared across delivery partners. This will also inform how funding is allocated going forward, to make sure it is having the most impact.”</i> This work is within the remit of the Partnership Board and GLA and MOPAC officers. Comments will inform the Partnership Board, so that it can take account of them as this develops and seeks to include learning from data gathered from services and other sources.</p> <p>3.10. Change: The strategy already draws on a wider evidence base of 80+ total citations beyond the statutory needs assessment. To make it clear that unidentified needs are not assumed to be met, further sources from the wider evidence base already present in the EQIA could be brought into the strategy summary section.</p>
<p>3.11. A cost-benefit value model to weight quality versus costs regarding specialist ‘by and for’ services should be devised</p>	<p>3.11. No change: Although it is agreed that this may be a beneficial model to develop, there is no benefit in amending the strategy to specifically commit to this over other potential tools and models. This suggestion will be shared to consider within the Partnership Board’s, GLA and MOPAC’s delivery plan remit on commissioning.</p>
<p>3.12. A Pan-London data collection that enhances collection on protected characteristics should be devised</p>	<p>3.12. No change: Although this is a beneficial collection to develop, there is no benefit in amending the strategy to pre-emptively commit to this over other potential uses of the Part 4 duty ahead of future commissioning engagement. This suggestion will be shared within the Partnership Board’s, GLA and MOPAC’s delivery plan and strategic engagement on commissioning remits to consider further.</p>

Theme 4 – Support for victims/survivors	GLA and MOPAC response
4.1. Implement a working definition of specialist 'by and for' services	4.1. No change: A working definition for future DASA commissioning of specialist 'by and for' services is already in development through GLA and MOPAC officer's engagement with specialists – this will be ready to be referenced in future commissioning products by Spring 2025.
4.2. The challenging landscape of public sector and VCS funding could have been better acknowledged in the strategy	4.2. No change: Challenges in the landscape of funding are addressed in the Mayoral foreword, The impact of a national housing crisis, COVID-19 pandemic and the cost of living is addressed by the Mayor and in reflections set out for boroughs and organisations in the 'Working together to implement the Duty in 2025-28' section. The needs assessment sets out a full view of London's needs and demand and that demand outpaces support provision available. It states that the Mayor has, and will continue to make the case to national government on seeking long term, sustainable Part 4 funding that meets the needs of all victims/survivors in London.
4.3. The 'by and for' specialist approach should include provision for 'by and for women' service providers	4.3. No change: Mayoral Objective 3 of the strategy is clear that support provided should be both trauma and gender informed. The strategy does not preclude support from being bid for. A grants programme and further developed commissioning will ensure that support delivered is tailored to the needs of victims/survivors. A working definition of 'led by and for' is in development with 'by and for' specialists delivering support.
<p>4.4 Representation of underserved groups</p> <p>(a). The Mayor of London alongside MOPAC and the GLA must address the systemic and structural failure in London in providing post-emergency: medium to long-term safe accommodation for male victims of domestic abuse. This is both in the availability of such accommodation by local authorities and consequentially the provision of support services in such accommodation (Mayoral)</p>	<p>4.4 (a-j) Change: A range of suggestions to raise the profile of groups of underserved victims/survivors in London specific groups of victims/survivors across London were captured throughout this theme and are set out to show the breadth of suggestions.</p> <p>A specific commitment set out under Mayoral Objective One should more explicitly state the intent to address all the recommendations within the needs assessment, (including on identified gaps) to effectively respond to the needs of victims/survivors and partners.</p> <p>Further – it should be drawn out how engagement mechanisms led by Partnership Board through a delivery plan, and by setting up / utilising channels to convene and respond to challenges, will address the needs of particular underrepresented groups.</p> <p>As in Theme 3, the strategy needs assessment summary could reflect further references to the wider evidence base on gaps in provision, apparent in the Equalities Impact Assessment, for completeness.</p>

<p>(b) A pan-London inquiry on male victims to understand demand (emergency and post emergency provision) and how to meet demand. Assess (and then take action) the compliance by London's local authorities meeting their statutory housing obligations to male victims of domestic abuse</p>	<p>4.4 (a-c), No Change: The Mayor cannot enforce or mandate the level of support provided by boroughs to victims/survivors. City Hall has ensured that the commissioning of support for victims and survivors of domestic abuse has included the provision of funding for services that support male victims and survivors including LGBTQ+. London boroughs will have been provided with information on these services and their providers. The providers also work within their communities and geographical local areas to ensure victims/survivors and professionals are aware of ways to access their services.</p>
<p>(c) Undertake assessment on if MOPAC and the GLA are in breach of Domestic Abuse Act 2021, on provision for male victims of domestic abuse</p>	<p>(d) No further change, covered in change recommended set out at 4.4 (a-j)</p> <p>(e) Refer to Theme 8 on refreshing Partnership Board. as this falls under that element.</p>
<p>(d) Make explicit reference to male victims and related named actions within the strategy's priority activity areas</p>	<p>(f) No further change: out of scope for the Part 4 duty. The comments will be shared with VAWG strategy and Policing and Crime Plan officers leading the refresh of these strategies in 2025. Any opportunities available for consulting on issues under their remits are set out on london.gov.uk</p>
<p>(e) Respondent representing male victims/survivors is made a full core member of the London Domestic Abuse Safe Accommodation Partnership Board</p>	<p>(g) No further change: The Duty states that legal support can be provided and support comprising of legal advice is already delivered through the Mayor's commissioned services in accordance with the Duty's remit. Covered in change set out at 4.4 (a-j) and also Theme 5 on engaging specific housing delivery stakeholders.</p>
<p>(f) Develop a gender-based violence plan for male victims in London</p>	<p>(h) No further change. This is covered in change set out at 4.4 (a-j), including support needs related to mental health and substance misuse, sometimes in combination with other issues. Provision will need to address the barriers to access that this cohort faces.</p>
<p>(g) Consider the needs of women in contact with the CJS – many who are survivors of DA</p>	<p>(i) No further change: It is beyond the scope of this strategy to address the fundamental problems faced by survivors with no recourse to public funds (NRPF). The Mayor has lobbied the government consistently on these issues and will continue to impress upon the Home Office the need for it to fast track the cases of survivors of domestic abuse.</p>
<p>(h) Highlight that support provision for those with mental needs should be extended to cover those using drugs and alcohol, especially women</p>	<p>(j) No further change: The diversion and support of perpetrators is critical to victims/survivors' safety. However, work to this end sits</p>

<p>(i) The strategy is limited in its ability to improve outcomes for migrant victim-survivors with no recourse to public funds</p> <p>(j) Include early intervention programmes and diversionary housing pathways for perpetrators in the strategy</p>	<p>outside the scope of Part 4 of the 2021 Act. MOPAC currently commissions the following perpetrator-focussed services:</p> <p>Culturally Integrated Family Approach (CIFA): This service is for racialised and minoritised communities, providing 1:1 culturally-informed sessions.</p> <p>The Safe & Together™ London Partnership (S&T): Trains and supports professionals in Children's Social Care, CAFCASS and policing to hold perpetrators to account and challenge them to change their behaviour.</p> <p>Restart: Offers 1:1 support to perpetrators, including housing options to support survivors and children to maintain housing security. Safe and Together training is part of the model.</p> <p>DA Conditional Cautions: MOPAC and MPS will deliver a small-scale, 1-year pilot in 2025 to test the safest and most effective way to administer Conditional Cautions in cases of 'standard-risk' DA before rollout of the Two-Tier Framework is introduced by central government.</p> <p>GPS tagging pilot for non-DA stalkers: This pilot uses GPS tags for non-DA Stalkers on licence (MOPAC operating model) and on community sentences (MoJ/EMS model). It launched on 3rd December.</p> <p>Stalking Threat Assessment Centre (STAC): This multi-agency unit delivers specialised advice, training and consultation to MPS officers, Probation services, NHS mental health services and victims services to improve the overall response to stalking in London. MOPAC commissions the victim advocacy service and supports the unit's strategic direction.</p>
<p>4.5 More clarity on how the Mayor plans to tackle the issue of staff recruitment and retention in the VAWG industry</p>	<p>4.5 No change: The overall commitment to workforce across VAWG provision sits within the VAWG strategy, at the time of writing undergoing a refresh for Spring 2025, with consultation specifically around the cross-cutting challenges that go beyond the Duty's remit. This strategy should be read in conjunction with the VAWG strategy. With regards to DASA, the Mayor has impressed upon the Government the need for longer-term funding for Part 4 duties , a lack of which impacts upon providers' ability to provide sustainable staff provision.</p> <p>DASA funding opportunities, developed through consultation with VAWG providers in 2025-28, can be used to enhance workforce development to benefit and serve victims/survivors in relevant safe accommodation. DASA commissioning developed in collaboration with partners in 2025 and beyond will be informed both by the VAWG strategy refresh and further engagement with providers, in alignment with this strategy's commitment to ... <i>'A supported and developing VAWG sector'</i> which states that <i>'Supporting the</i></p>

	<i>development and resilience of the VAWG workforce is a wider priority within the Mayor's VAWG strategy. For example, for the VAWG sector, specialist training and workforce development may build resilience and capacity which can in turn support recruitment and retention in DASA delivery.</i>
4.6. Grant funding for PIE should be available to specialist VAWG providers of all size	4.6. No change: The strategy commits to the Mayor making future funding available for small, specialist and 'by and for' providers
4.7. Be clearer in outlining the relationship between accommodation and accommodation support, and how funding is allocated to both	4.7. Clarify: This relationship is set out in 'The scope of the Mayor's powers' section. For absolute clarity, a final strategy should reiterate further, in brief, that the Domestic Abuse Safe Accommodation Homes Programme's capital funding is separate and additional to revenue only funding through the Part 4 Duty revenue (this is an independent Mayoral innovation outside the Duty which itself places no requirement for Authorities to provide buildings or units)
4.8. The strategy should be rooted in a stronger commitment to sustain and stabilise existing specialist services, and shouldn't divert funding away from survivors and expert frontline services by increasing capacity building in larger, well-funded organisations	<p>4.8. Clarify: Mayoral Objective 5 states that <i>'funding will support the VAWG sector – and those across the DASA system – to develop overall capacity and sustainability, and 'Commissioning and funding approaches will be designed to benefit under-served victims/survivors, and will seek to bolster workforce development and resilience within the VAWG sector specifically.'</i></p> <p>The strategy already re-commits the Mayor to making funding available for small, specialist and 'by and for' providers, and to doing so through processes that will ensure they are not disadvantaged, relative to larger organisations with a broader remit.</p> <p>The Mayor wants to ensure smaller specialist providers can grow and build, so that more victims/survivors can be reached. Mayoral Objective 3 states that <i>'funding should focus on bringing existing provision to high and current standards, and developing new, practice-leading provision.'</i> Wording in the narrative could be reviewed to ensure that the focus on sustainable provision, existing provision and on building overall resilience for the VAWG sector is key – alongside the commitment to specialist providers that is clearly set out.</p>
4.9. More clarity on how the strategy connects with wider VAWG strategy and Policing and Crime Plan commitments	4.9. Clarify: Reference to these strategies and their refreshed remits should be made in final DASA strategy. Adding update to the final strategy on timescales for PCP and VAWG refresh would be helpful- refer to example of how strategies interact and note consultation findings are cascaded across for learning, delivery planning and engagement in 2025-28 through DASA
4.11. The strategy should highlight the need for physically and	4.11. Clarify: This is covered in Objective 3 –to achieve <i>'Services and accommodation that are physically and psychologically safe, of high quality, and use up-to-date and appropriate practice.'</i>

psychologically safe spaces with statutory settings	<p>All support services funded through the Mayor's commissioning that arises from this strategy will need to demonstrate that they ensure the physical and psychological safety of survivors.</p> <p>Furthermore, the executive summary provides covering statements that the Mayor's ambitions apply to safe accommodation services across the board, not only those commissioned under the Part 4 duties.</p> <p>The narrative should be reviewed to reflect the needs assessment findings that all partners across the landscape, such as children's services and health, must play a strengthened part in providing trauma informed responses.</p>
4.12. <i>'So that barriers faced by victims/survivors in accessing services are reduced'</i> should be added back in from the 2021 strategy	4.12. Clarify – add this line into priority activity under objective 2.
<p>4.12. Emphasise how we can ensure the affordability of move on accommodation and interrupt the bottleneck</p> <p>4.13. A commitment to increased funding for move-on accommodation</p> <p>4.14. Not clear where move-on sits within the strategy, for example, developing coordinated schemes.</p>	<p>4.12. No change: Ensuring the affordability of accommodation is out of scope for the delivery of support in safe accommodation under the Part 4 Duty. The shortage of both safe accommodation for move-on and all accommodation that is affordable to survivors is recognised by the Mayor from the strategy foreword onward as a key obstacle for victims/survivors. The Mayor is committed to increasing the supply of safe accommodation for move-on and is also working to increase the supply of affordable housing through his planning policies and Affordable Homes Programmes.</p> <p>4.13. No change: Further information on future provision of support will be determined and provided as part of the 2025-28 commissioning approach</p> <p>4.14. No change: The 2025-28 commissioning approach will in principle, remain outcomes-focused and will seek to avoid being prescriptive about specific approaches to delivery wherever possible. There is little benefit therefore in amending the strategy to specify how the development of move-on schemes should progress. For example, limiting the scope of this in the strategy may limit the scope for a borough or group of boroughs to commission providers according to local needs. For example, the provision of domestic abuse referral pathway coordinators within boroughs can be enhanced, with boroughs working directly with and going into refuges and other safe crisis accommodation, to plan and manage pathways out and identify suitable move-on accommodation.</p>

Theme 5 – Partnership working	GLA and MOPAC response
<p>5.1. Greater distinction between the need for direct support offered in safe accommodation, compared to holistic support and systems change work with housing providers</p>	<p>5.1. Change: While Mayoral objectives in the refreshed strategy are already set out to distinguish between leading direct support and provision and facilitating/convening 'system level' partnership working, it would be helpful to add a further priority activity on relationship building by the GLA with housing stakeholders at operational level, to encourage further engagement and innovation regarding the delivery of the Duty. This would refer to reviewing further how DASA and housing are integrated operationally at GLA and MOPAC level - and encouraging housing partners to take a more active role in DASA activity.</p> <p>This priority area should set out that strategic engagement is intended to work in tandem with other activity at local level, such as boroughs' progress towards DAHA accreditation, which is intended to improve local authority services' ability to support survivors appropriately.</p>
<p>5.2 MOPAC could build Corporate Social Responsibility (CSR) programmes for London accommodation organisations, instead of allocating small amounts of money for things that could be achieved through CSR.</p>	<p>5.2. No change: Further information on the future provision of other support, including will be determined and provided as part of the 2025-28 commissioning approach. MOPAC and GLA officers will incorporate these views and suggestions within further strategic engagement on commissioning approach.</p>
<p>5.2. An unaddressed issue is poor practices by housing teams, which hinder small providers by failing to recognise their status as supported housing, impacting DASA funded project delivery</p>	<p>5.2. Clarify: The needs assessment surfaces delivery challenges at local level, of which there are a range, across the DASA landscape. This should be read in conjunction with the strategy. It may be helpful to ensure this is more clearly reflected, in brief, in the narrative paragraphs of the 'Working together to deliver the duty section' alongside reflecting on the strengths of boroughs, providers and partners delivering the Duty. A change is already recommended (4.4) to more explicitly summarise a commitment to addressing the recommendations of the needs assessment.</p>
<p>5.3. Call out the need for LAs and housing providers to work across specialities and geographies, and provide clarity on how disparity of postcode lottery will be addressed</p>	<p>5.3. No change: The Act's requirement that Tier 2 authorities 'co-operate with' the Tier 1 authority does not mean that the Mayor can enforce that boroughs continue to fund existing services, or address the disparity between boroughs' investment in such services. Work cited in the strategy to engage boroughs and housing providers across specialties and geographies, and to address disparities in provision is set out as a priority.</p> <p>It is for the Partnership Board to determine the scope of this work and how it will be progressed. The strategy cites that...<i>The Mayor</i></p>

	<p><i>has long argued that a regional approach to delivering DASA is crucial. City Hall holds relationships across the delivery partners involved in the victim/survivor journey and can harness these to align delivery strategically across London.'</i> A specific priority activity relating to making progress on the geography of provision is set out under the Board's remit, including, <i>'Over the next three years, the Mayor will work with, and learn from, boroughs and a range of sector organisations to map services and build on existing data sets to pinpoint geographical gaps, that will support engagement with boroughs.'</i> GLA and MOPAC officers will ensure the Partnership Board sees this suggestion to address in delivery planning (1.1).</p> <p>Further to this the strategy commits that <i>'the GLA will ensure regional and pan-London interventions support victims/survivors in ways that would not be possible at a local level; and to work closely with boroughs to do this in the most effective way.'</i></p>
5.4. Emphasise importance of awareness raising for safe accommodation	5.4. No change: Further information on the future provision of support, including advice and helpline support (this type of support remains in scope under the Duty's national guidance) will be determined and provided as part of the 2025-28 commissioning approach.
5.5. It is unclear on how to navigate limitations to nomination agreements	<p>5.5. No change: It is for the Partnership Board to determine the scope of pan-London work and how it will be progressed. Specific activity to reflect the sharing of best practice, learning and evaluation, and improving data are already set out under priority activity areas.</p> <p>A change is already recommended at Theme 1.1 to set a priority area out on developing a delivery plan through the Partnership Board, 5.1 to reflect operational engagement with housing stakeholders further, and in Theme 7 on refreshing the role and function of the Partnership Board.</p> <p>GLA and MOPAC officers will ensure the Partnership Board is aware of this specific delivery challenge.</p>
5.6. The North London Reciprocal Arrangements used to work very well especially for those with secured housing. Can these arrangements be continued and supported?	<p>5.6. No change: The needs assessment evidences the success and challenges of reciprocal arrangements delivered at pan-London level to date and a specific priority area is already recommended to more explicitly note addressing its recommendations, for clarity (4.4) .</p> <p>Further information on the future provision of support will be determined and provided as part of the 2025-28 commissioning approach.</p>

Theme 6 – Tier 2 authorities	GLA and MOPAC response
<p>6.1. Role of Tier 2 authorities lacks clarity</p> <p>6.2. Helpful to have clear delineation of responsibility, recommendations to Tier 2 authorities.</p> <p>6.3. More detail on how MOPAC expects to work with London boroughs, Integrated Care Boards and other statutory agencies to ensure strategic coordinated approach to the Part 4 Duty.</p> <p>6.4. Helpful to include more information about how the Mayor intends to work with boroughs to deliver on a pan London DA strategy</p> <p>6.5. Further detail on how the Mayor will provide adequate resource for LAs to sufficiently respond to these gaps within the outlined timeframes</p>	<p>6.1-6.5. Change: It would be helpful to clarify further in the executive summary and 'Scope of the Mayor's Powers' section that London boroughs have a duty to cooperate with the GLA in the exercise of these duties, and are in receipt of new burdens funding in relation to this, yet Part 4 does not give the Mayor a basis for 'enforcing' activity in the strategy. It would be helpful to stress further that ultimately, for the strategy to deliver maximum benefit for victims/survivors of domestic abuse in London, all partners need to work together.</p> <p>The strategy already reflects that '...the Mayor and his Deputy Mayors for Housing and Residential Development, and Policing and Crime, will convene and communicate with leaders across the landscape of housing and VAWG provision, and with wider partners (such as those representing registered housing providers, and health partners) to foster engagement and collaboration.'</p> <p>Beyond this, it is for the Partnership Board to determine the scope of pan-London work and how it will be progressed. Specific activity to reflect the sharing of best practice, learning and evaluation, and improving data are set out in commitments. This can include practice already in the landscape such as the utilisation of floating support officers, training for the local implementation of quality responses to victims/survivors, borough co commissioning with providers.</p> <p>A change is already recommended at Theme 1.1 to set a priority area out on developing an action plan through the Partnership Board, at 5.1 to reflect GLA's operational engagement further, and in Theme 7 on refreshing the Partnership Board. GLA and MOPAC officers will ensure the Partnership Board is aware of these suggestions.</p> <p>As set out in the strategy, future commissioning will also be collaborative with boroughs as key partners in the delivery of the Duty, alongside providers and other agencies involved in support for victims/survivors where safe accommodation is part of the response to addressing domestic abuse.</p> <p>The impending government duty to collaborate is also cited in the strategy and this will further evolve the remit of pathways to strategic collaboration in relation to domestic abuse throughout 2025-28.</p>

6.7. Need further clarity on how the Mayor's office evaluates the effectiveness of local authorities	6.7-6.10: No change: With reference to response 6.1-6.5 above, it is out of scope of the Mayor's powers under the Part 4 Duty to evaluate the effectiveness of, or provide oversight to local boroughs' housing arrangements or performance related to housing provision.
6.8. Mayor's Office need to strengthen its role in providing oversight to local authorities to embed specialist housing advocacy provision across all boroughs	The limited supply of social rented housing is a primary factor that makes it challenging to enable survivors who are social housing tenants to transfer to alternative social rented housing. The Mayor is working to increase the supply of social rented homes through his planning policies and his programmes of investment in affordable housing. Meanwhile, the Partnership Board will seek to identify suitable interventions in the course of its work and GLA and MOPAC officers will ensure that the Board is aware of these comments. However, it is worth noting there the Mayor's Housing Moves schemes already provides a pool of social rented properties for survivors, among other social housing tenants with a pressing need to move, to which housing providers are expected to contribute. The Mayor's remit does not allow him to require providers to make additional homes available, as the law requires that these are allocated primarily through local authorities' allocations schemes for social housing.
6.9. Specific measures to ensure boroughs with significant housing challenges are adequately supported in meeting their obligations.	
6.10. Strategy must work with LAs in terms of commissioning and temporary accommodation provision	
6.11. More focus on DAHA accreditation should be placed within the strategy	No single measure in the strategy serves as a panacea for the problems that the strategy seeks to address. The strategy's commitment to improving the supply and accessibility of safe accommodation also stands to improve the experience that survivors have when seeking help from housing options services, because it will mean that these services have more and more suitable options to offer survivors.
	The funding available to implement the duties created by Part 4 can be used to help cover the costs of training and support – including DAHA accreditation which is highlighted as a route to improved system responses - throughout the needs assessment and the strategy

Theme 7 – Refreshing Partnership Board	GLA and MOPAC response
7.1. Review the Partnership Board with a focus on its functions, activities and outcomes.	7.1-7.7. Change: Initial scoping work to refresh the role, function and governance of the DA Partnership Board has already started for 2025, not least through reflections from the Board in pre-consultation engagement and consultation. An additional priority activity focusing explicitly on this review work in 2025 should be inserted. This should reference that the Board will communicate with partners on the delivery plan. This should sit under Mayoral Objective 4 in the final strategy.
7.2. Collaboration could be enhanced by greater clarity about governance and access to the independent	

<p>strategic collective voice provided by the ERG</p> <p>7.3. Recommend further investment in the ERG</p> <p>7.4. Refresh borough Housing attendance</p> <p>7.5. Don't dilute the Board's VAWG expertise impact by inviting too many partners</p> <p>7.6. Hold smaller action-oriented groups and sessions more regularly.</p> <p>7.7. Cascade information to all partners from the Board regularly</p>	
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Theme 8 – The scope of the duty	GLA and MOPAC response
8.1 Would welcome discussion with the Mayor's office on influencing the scope of the Part 4 Duty to address diverse, intersectional needs	8.1. No change: City Hall would welcome this discussion and the vehicle for this engagement is the Partnership Board, tasked with supporting the Mayor to implement the strategy. This discussion is best placed in delivery planning through the Board (1.1) rather than the Mayoral strategy.
8.2 Support safe accommodation providers in assisting victim transition in and out of temporary accommodation.	8.2-8.6. Clarify: The Mayor does not advocate the use of generic temporary accommodation for victims/survivors. It is a reality that many survivors end up in temporary accommodation and the commitment is a pragmatic one that seeks to ensure that they receive appropriate support. It is publicly recorded in the 2021-24 strategy that as the duty was developed, the Mayor urged the Government to include all accommodation secured by local authorities for homeless households made homeless by domestic abuse within the scope of Part 4 and will continue to do so. A further clarification should be made that the Mayor would seek to encourage mechanisms to safeguard against misuse of any expansion of the current Duty's scope.
8.3 Strategy must work with LAs in terms of commissioning and temporary accommodation provision	
8.4. There should be greater prominence of the duty being widened to benefit all victims/survivors, including those in temporary accommodation	
8.5 Strongly recommend not progressing widening the scope of the	It is outside the scope of the Mayor's powers to set requirements for the standard of temporary accommodation – this is covered in legislation and guidance on local authorities' responsibilities to homeless households and in voluntary approaches agreed by London local authorities.

<p>duty to include temporary accommodation</p> <p>8.6 Mechanisms must be put in place to safeguard against the potential misuse of the expanded definition of bringing temporary accommodation into the Part 4 Duty</p>	
<p>8.7. MHCLG 'bedspace' data categories are too limited to reflect the type of support provided, for example</p> <p>8.8. Government safe accommodation definitions do not work for disabled victims/survivors.</p> <p>8.9. MHCLG should collect reporting on quality of victims/survivor experience</p> <p>8.10. There should be more leniency in reporting timescales- to reflect time spent mobilising support and relationship building with victims/survivors.</p> <p>8.11. Regard should be given to the interdependency of funding and the impact of multiple funder pressures have on the wider infrastructure.</p>	<p>8.7-8.11: No Change: The work to capture and share continual improvements on MHCLG reporting and advocating on the wider challenges of government funding cycles is ongoing. The GLA and MOPAC actively engage with MHCLG on continually developing and improving their national statutory guidance regarding the implementation of the Duty. The strategy commits to that the Mayor will continue to make the strong case to government the need for adequate, long-term funding to meet Duties under the Act.</p> <p>Refreshing the 'Mayor's Progress' section as recommended at 2.1 should highlight the commitment to this work.</p>

Wider reflections

Wider reflections	GLA and MOPAC response
<p>9.1. The greatest impact on the sustainability of the sector is short term funding.</p>	<p>9.1. No change: The Mayor has, and will continue to make the strong case to government the need for adequate, long-term funding for the GLA and Tier 1 authorities elsewhere to meet their Duties under the Act.</p>

9.2. VAWG-related need and demand is extremely high	9.2. No change: Through his wider VAWG strategy (currently being refreshed), the Mayor recognises the endemic nature of VAWG and its related demand - and encourages everyone in London to play their part in ending the epidemic of violence against women and girls. VAWG related need and demand in the context of domestic abuse support provision under the Part 4 Duty is clearly acknowledged and responded to in this strategy.
9.3. There is limited understanding of survivor's needs related to locations of safe homes	
9.4. It is concerning that victims/survivors may need to move long distances outside of London beyond their support networks	9.3, 9.4. No change: The strategy acknowledges and deals with the wider issue that a national housing crisis presents significant challenges to providing the right help at the right time, and points to strategies that support the Mayor's activity in relation to this. The Mayor does not direct local boroughs on their provision of individual housing allocations on a case-by-case basis. Communication between boroughs is vital to determining the provision of local support for individual victims/survivors and all safe accommodation should only accept referrals where survivors can be accommodated safely.

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