

Support for victims/survivors of domestic abuse and their children in safe accommodation

A draft strategy for London – consultation response report

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**Greater London Authority
December 2021**

Published by
Greater London Authority
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Copies of this report are available from www.london.gov.uk

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1 Introduction and background

Purpose and structure of this report

- 1.1 This report is intended to provide a summary of responses to the consultation on the London's draft Domestic Abuse Safe Accommodation Strategy. Prior to publication, this report was submitted to the Mayor to enable him to consider the issues raised through the consultation before determining the final version of the strategy. To this end, this report summarises views expressed and comments made by respondents; and sets out any changes to or clarifications made as a result of these.

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

- 1.2 The Mayor developed his draft Domestic Abuse Safe Accommodation Strategy under duties conferred on the Greater London Authority (GLA) by the Part 4 of the Domestic Abuse Act 2021 (the 2021 Act).
- 1.3 This requires each Tier 1 authority (the GLA in London) to assess the need in its area for support in safe accommodation for victims/survivors of domestic abuse and their children. It obliges Tier 1 authorities to prepare and publish a strategy for the provision of such support in its area, including consulting on a draft version. The 2021 Act also specifies that Tier 1 authorities must give effect to their strategy and monitor and evaluate its effectiveness. The Mayor has approved the GLA entering into a shared services arrangement whereby the Mayor's Office for Policing and Crime (MOPAC) supports the GLA to undertake the activities associated with the new duty.
- 1.4 Tier 1 authorities are also required to appoint a Local Partnership Board to advise them in exercising these new duties. Information on London's Board is available at www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/services-we-fund/accommodation-based-support-survivors-domestic-abuse.
- 1.5 The Department for Levelling Up, Housing and Communities (DLUHC) allocated new burdens funding for 2021-22 to authorities tasked with these duties. This included £20.688m allocated to the GLA, to cover both administration and support costs.
- 1.6 Some of this funding has been allocated to boroughs and service providers to continue services funded directly by the DLUHC in 2020-21. The GLA has made £12.4million available to fund new and enhance existing services via a commissioning round currently under way. Further information on this is available at www.london.gov.uk/what-we-do/mayors-office-policing-and-crime

[mopac/services-we-fund/accommodation-based-support-survivors-domestic-abuse](#).

London's Domestic Abuse Safe Accommodation Strategy

- 1.7 London's draft strategy was informed by a London-wide needs assessment, which was published with the draft strategy and will also accompany the final version. The needs assessment included in-depth consultation with stakeholders. The draft strategy was informed by both that consultation and further wide-ranging engagement with stakeholders carried out over the 12 months prior to its publication.
- 1.8 This engagement included surveys of London boroughs and other key stakeholders (76 groups and individuals). Twenty-five boroughs (mainly Violence Against Women and Girls (VAWG) Coordinators), 47 service providers, 10 housing providers and 14 key other stakeholders responded to surveys and/or participated in meetings. Seven victims/survivors also participated in this engagement.
- 1.9 The draft strategy also reflects relevant commitments contained in the Mayor's VAWG strategy and the London Housing Strategy. These strategies were themselves subject to public consultation and impact assessments.
- 1.10 The Mayor's vision, in relation to the Part 4 duties, is:

'...that all survivors of domestic abuse, including children, are able to access and be supported by safe accommodation-based services, tailored to their needs, to enable them to move on with their lives.'

This vision is underpinned by six objectives and a series of proposals arising from the following policies:

- improving early intervention
- improving access to and the provision of safe crisis accommodation
- improving access to and the provision of second-stage and move-on accommodation, and resettlement support
- improving the quality of accommodation
- tackling overarching issues, such as meeting the diversity of need, and improving data and information.

2 Consultation process

Introduction

- 2.1 The public consultation on London's draft Domestic Abuse Safe Accommodation Strategy ran from 5 November 2021, when the consultation document was published on www.london.gov.uk, to 21 November 2021.
- 2.2 The consultation period was short because of the statutory timeframes, which were only confirmed on 9 September 2021, for publishing draft and final strategies (by 28 October 2021 and 5 January 2022 respectively). The capital's complex landscape of needs, provision and stakeholders made meeting these requirements all the more challenging in London. Consultation had to close on 21 November, to allow time to consider respondents' comments and revise London's strategy in light of them.
- 2.3 The GLA would have preferred to hold a longer consultation. However, stakeholders had many opportunities to influence the development of the draft strategy, as outlined at paragraphs 1.7 to 1.9 above. The GLA will also revise both its needs assessment and its strategy regularly, so that it can better target funding and action to meet need more fully. This work will be overseen by the multi-agency Partnership Board that the GLA has appointed to advise on its exercise of the duties created by Part 4 of the 2021 (and as required by it). So, through the Board and in other ways, there are ongoing opportunities for stakeholders to influence the GLA's work under Part 4 of the 2021 Act.
- 2.4 The consultation used a form that asked respondents to comment on any of the five policy areas set out in the strategy (see paragraph 1.10 above), or the specific proposals within them. It also invited them to comment on any other aspects of the strategy. It invited those who wished to respond to complete this form online, or to submit a version of the form by email or post.

Publicising the consultation

- 2.5 The consultation document was made available on a page on the GLA website; a link to that page was provided on MOPAC's. This GLA page was viewed by 955 different individuals over the period of the consultation.
- 2.6 MOPAC emailed a wide range of stakeholders inviting them to respond to the consultation. They included those the 2021 Act specifies should be consulted on the draft strategy: the Partnership Board, Tier 2 authorities (the London boroughs in London) and 'such other persons as the relevant local authority considers

appropriate'. They also included providers of domestic abuse services, including specialist 'by and for' providers.

- 2.7 GLA and MOPAC officers also engaged partner organisations on the draft strategy in the course of regular meetings, such as the Pan-London Housing Needs and Homelessness Group, and the Local Authority Rough Sleeping Leads Group; and in other interactions with stakeholders.
- 2.8 MOPAC held two consultation workshops during the period of the consultation, one for local authority officers, including VAWG coordinators, and one for providers. These offered an opportunity for attendees to hear about and give feedback on the draft strategy. There is a list of attendees at Appendix 2. In addition, the Partnership Board was consulted on the draft strategy at a meeting on 23 November 2021.

Responses to the consultation

- 2.9 The Mayor received 33 responses to the consultation. Of these, 29 came from organisations; one from a professional body; one from a community safety partnership; and two from individual members of the public. A list of organisations that responded to the consultation is included at Appendix 1.

Figure 2.1: Organisations that responded to the consultation

Organisation type	Number of responses received
Local authority	18
Voluntary/community sector – front-line service provider (VAWG-specific)	3
Voluntary/community sector – front-line service provider (not VAWG-specific)	2
Voluntary/community sector-campaign/research/representation (VAWG-specific)	1
Voluntary/community sector-campaign/research/representation (not VAWG-specific)	3
Housing association	2
Professional body	1
Community Safety Partnership	1
Total	31

- 2.10 Of responding organisations, 21 commented directly on all of the five policy areas and 10 commented on some of them. Of responding individuals, one commented directly on all of the five policy areas and one on some of them.

Processing consultation responses

- 2.11 Responses to the consultation were analysed as follows, in part to try and ensure that all comments were captured for consideration:
- GLA and MOPAC officers identified respondents as individuals or organisations, and classified organisations against the categories used in Figure 2.1 above.
 - Every comment within each response was grouped by the policy area and, where applicable, the proposal to which it related. Comments that did not relate directly to any of the policy areas and proposals were recorded under the heading 'other'; and, where applicable, in any chapter of the strategy to which they related.
 - Where comments related to the impact of the proposals on those with characteristics protected by the Equality Act 2010, officers highlighted that. These comments were then taken into account in refining the Equalities Impact Assessment that was prepared to accompany the strategy and will be published alongside the final version.
 - GLA and MOPAC officers reviewed all comments related to each policy area and proposal, and all those placed in the 'other' category, to identify recurring themes.
 - GLA and MOPAC officers identified the most prominent recurring themes made in comments on each policy and proposal and on other issues.
- 2.12 Officers also noted comments made in the workshops and meetings detailed at paragraph 2.8. above. They recorded these in relation to different policy areas and proposals, and other issues.

Presenting consultation responses

- 2.13 Chapters three to seven of this report cover the five policies contained in the strategy in turn, with sections in each chapter on specific proposals within the relevant policy. Chapter eight covers comments that respondents made on other issues related to the strategy.
- 2.14 These chapters contain the following information:
- the number of consultation respondents who made comments in relation to each of the policy areas and to proposals within them, or – for chapter seven – on other issues related to the strategy (their type is shown in tables at Appendix 3)
 - the most prominent recurring themes in respondents' comments

- a summary of the comments made that relate to each of those recurring themes
- a summary of any comments made in workshops and meetings detailed at paragraphs 2.7 and 2.8 above that relate to the policy area and proposals covered in the chapter
- an officer recommendation in response to comments made under different recurring themes where these comments suggest changes or clarifications to proposals or other aspects of the strategy.

2.15 The officer recommendations included in chapters three to eight of this report are reflected in the final version of London's Domestic Abuse Safe Accommodation Strategy, to be approved by him in light of this report.

2.16 The primary changes to the final version of the strategy recommended in response to the comments detailed in this report are summarised below:

Policy 5: Tackling overarching issues

- The addition of the following sub-policies:
 - improving the provision of buildings
 - creating a more equitable and sustainable approach to funding across London.
- The addition of the following proposals:
 - Registered providers should work with service providers to ensure that buildings accommodating existing services are fit for purpose and, where appropriate, are refurbished or remodelled to meet the needs of victims/survivors. They should also support service providers to develop new services by partnering with them to deliver new buildings.
 - Periodic refreshes of the London Domestic Abuse Safe Accommodation Needs Assessment will include monitoring the level of provision of safe accommodation services in London, including any decommissioning.
 - The Partnership Board will work with partners to explore how a more equitable approach to funding safe accommodation services across London can be achieved; and to ensure effective communication between home and host boroughs.

Policy 6: Improving early intervention

An enhancement of proposal 6.1, to specify that housing associations' and boroughs' accreditation by the Domestic Abuse Housing Alliance (DAHA) should cover not only their role as housing providers, but also as providers of other services, such as housing options services; and that the opportunity for accreditation should be extended to private landlords and letting agents.

Policy 7: Improving access to and the provision of safe crisis accommodation

- An enhancement of proposal 7.4, to specify not only that specialist support should be available to victims/survivors and their children placed by boroughs in generic temporary accommodation (TA), but also that the Mayor will continue to lobby for the inclusion of this support in the Part 4 duties (it is currently beyond scope).
- A change to proposal 7.7, to specify that a pan-London single point of entry (that is, provision via a single organisation) should enable effective access to safe crisis accommodation for all victims/survivors, including those with specialist needs such as people with no or limited recourse to public funds and/or multiple disadvantage. The draft strategy proposed new, separate single points of entry for those with specialist needs.

Policy 8: Improving access to and the provision of move-on and second-stage accommodation, and resettlement support

No substantive changes.

Policy 9: Improving the quality of safe accommodation

- The addition of the following proposals:
 - The design of safe accommodation, including refuges and other crisis accommodation, second-stage and move-on, should meet the needs of disabled victims/survivors.
 - Physical security should be ensured, with newly built or refurbished safe accommodation meeting Secured by Design requirements, and surveys by the Metropolitan Police's Designing Out Crime Officers undertaken where appropriate.

3 Policy 5 – Tackling overarching issues

Overview of comments

- 3.1 The consultation response form asked respondents to comment on the chapter of the strategy on tackling overarching issues, including specific proposals within it. Twenty-seven respondents, 82 per cent of the total, commented on this chapter. Of these, 26 were organisations and one an individual. A full breakdown of responses by respondent type is available at Appendix 3.

Proposal 5.1: Services should not be restricted to local residents

- 3.2 Number and profile of respondents: Sixteen respondents, 48 per cent of the total and 59 per cent of those who commented on the chapter on overarching issues, commented on this proposal. Of these, 15 were organisations and one an individual.

Recurring themes in comments on proposal 5.1

Theme 1: This proposal risks placing disproportionate demand on some boroughs

- 3.3 **Views expressed by consultation respondents:** By far the most commonly expressed view on this proposal was that it risks unfairly placing disproportionate demand on some boroughs – primarily those that have more and/or better domestic abuse services, but potentially also those with higher rates of domestic abuse or a greater influx of people into the area for employment or education. Beyond the inequity this would create, respondents suggested in potentially penalised boroughs that are committed to providing services. This view was expressed exclusively by local authorities.
- 3.4 **Views expressed by the workshop participants and the Partnership Board:** Local authority representatives also raised these concerns.
- 3.5 **GLA and MOPAC recommendation:** No change. Although some boroughs do commission more provision than others and quality is not necessarily consistent, amending this proposal will not create a more equitable system. Rather, permitting a more restrictive approach to access would disadvantage victims/survivors by limiting their opportunities to access services in locations that are safe for them. Moreover, boroughs typically already allow access to crisis accommodation to victims/survivors fleeing from outside their districts.

Theme 2: This proposal will help make access to services more consistent

- 3.6 **Views expressed by consultation respondents:** Some respondents, mostly local authorities, welcomed the potential for this proposal to create greater consistency in access to domestic abuse services across London – especially in conjunction with new pan-London services commissioned through Part 4 duties.

Theme 3: The remit of this proposal needs to be clarified

- 3.7 **Views expressed by consultation respondents:** Some respondents, mostly local authorities, suggested that the proposal required clarification. In most cases, this related to the types of services to which it applied – for example, domestic abuse services only, or accommodation-based services only. Some suggested that there might be legitimate exceptions, primarily for specialist accommodation where boroughs had invested in such services. A couple also suggested that it might be helpful to clarify that services could reasonably restrict access where accepting a referral would compromise a victim's/survivor's safety. A couple raised questions around the geographical scope of the requirement, including whether it might apply at sub-regional level.
- 3.8 **GLA and MOPAC recommendation:** Clarify. This proposal should be amended as follows: 'Safe accommodation services should not be restricted to local residents.' This will make clear that the proposal applies to the safe accommodation-based services covered by London's strategy.
- 3.9 No change. Specialist accommodation should not be exempted from this proposal. One of this strategy's key aims is for such accommodation to be more widely available, with new supply initially likely to be commissioned on a pan-London basis. As this aim is realised, the GLA considers that the benefits of such services to groups whose needs have often not been well-met should not be constrained by the location of those who need them.
- 3.10 No change. The GLA recognises that it may sometimes be unsafe for a service to accommodate a victim/survivor from the area where the service is located. However, all services commissioned under Part 4 will be required to ascertain that any victims/survivors referred to them could safely be accommodated in their service. It is not necessary to amend this proposal in order to ensure that they adopt this sensible approach.

Theme 4: Support may be compromised if victims/survivors access services in multiple boroughs

- 3.11 **Views expressed by consultation respondents:** Some respondents, all local authorities, suggested that the quality of support to victims/survivors might be compromised if they were to access services in multiple boroughs or ended up

being referred from borough to borough. Some suggested clear coordination would help mitigate this risk.

- 3.12 **GLA and MOPAC recommendation:** No change. This risk is best mitigated not by restricting victims'/survivors' access to services that they may need, but by establishing clear referral pathways and communication between services. Part 4 of the 2021 Act creates a welcome opportunity to improve coordination and communication across London, as well as for greater consistency in services. This creates the scope to reduce the risk of victims/survivors being referred from borough to borough or seeking to access multiple services.

Theme 5: Support may be compromised if victims/survivors access services in multiple boroughs

- 3.13 **Views expressed by consultation respondents:** Some respondents, again all local authorities, suggested that some of the risks attached to this policy could be reduced by a pan-London strategy on the point(s) at which a particular borough's services would assist a victim/survivor moving to a new stage in a pathway of services.
- 3.14 **GLA and MOPAC recommendation:** No change. There is no need to change this proposal. However, there would be value in domestic abuse referral pathway coordinators (proposal 8.1) agreeing a common approach to local authority responsibilities at different stages of a victim's/survivor's journey. This is something that the Local Partnership Board should also consider as part of its work to understand the need for move-on and second-stage accommodation (policy 5.8.3). However, in recognition of the challenge that exists in relation to smooth pathways, the final version of the strategy should contain a new commitment for the Local Partnership Board to work with partners 'to ensure effective communication between home and host boroughs.'

Proposal 5.2: Culturally-specific services and 'by and for' specialist providers

- 3.15 In full, proposal 5.2 is: 'Where required, services should be culturally specific, respond to the specific needs of different communities, and be run by 'by and for' specialist providers, where appropriate.'
- 3.16 Number and profile of respondents: Thirteen respondents – 39 per cent of the total and 81 per cent of those who commented on the chapter on overarching issues – commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 5.2

Theme 1: This proposal is welcome

- 3.17 **Views expressed by consultation respondents:** The bulk of comments made on this proposal were relatively brief and high-level, welcoming the strategy's support for provision that will better meet diverse need. Some noted current shortages of culturally-specific services. Among those who welcomed the proposal, some commended the ability of such services to engage particular communities; and others remarked that greater diversity of provision is in line with the diversity of London's population.

Theme 2: Such services should be commissioned on a pan-London basis

- 3.18 **Views expressed by consultation respondents:** Some respondents, mostly local authorities, suggested that culturally specific services should be commissioned on a pan-London basis.
- 3.19 **GLA and MOPAC recommendation:** No change. Existing patterns of provision demonstrate that individual boroughs rarely commission culturally specific services. This is unsurprising, given that the number of victims/survivors who may need a culturally-specific service is typically very small at local authority level. The introduction of Part 4, and the associated funding, provide a welcome opportunity to support and enable the commissioning of culturally-specific services. It is likely that these will be commissioned at a pan-London level. However, insisting on this may limit the scope for a borough or group of boroughs to commission such services where their populations warrant this – for example, because of demographic factors or levels of rough sleeping.

Theme 3: Delivering such services can be challenging

- 3.20 **Views expressed by consultation respondents:** Some respondents noted various challenges attached to delivering culturally-specific services, the importance of supportive commissioning approaches, their higher cost, and the difficulties that recruiting staff can present.
- 3.21 **GLA and MOPAC recommendation:** No change. It is undoubtedly the case that it can be challenging to deliver such services. This is part of the reason such services have not been adequately provided to date. The introduction of Part 4 and the Mayor's commissioning approach for funding pan-London services provides a welcome opportunity to ensure that specialist providers are not disadvantaged by commissioning processes and requirements (policies 5.7 and 5.10) and to allocate to them the level of funding that they require.

Theme 4: Multiple identities and some specific characteristics should be taken into account

- 3.22 **Views expressed by consultation respondents:** A few respondents noted the importance of such services accommodating victims'/survivors' multiple, intersecting identities. Two suggested characteristics or groups that should be taken into account: religion and older victims/survivors.
- 3.23 **Views expressed by workshop participants and the Partnership Board:** One provider also commented that older women seem to have been overlooked by the strategy. These stakeholders also noted that LGBTQ+ victims/survivors may well have support needs, including mental health, which need to be considered in allocating funding.
- 3.24 **GLA and MOPAC recommendation:** No change. The commissioning approach that implements many of the policies in this strategy does not preclude bids for funding for services that will support particular groups of victims/survivors, where there is clear evidence of their need. The needs assessment that informs this strategy encountered a lack of data in key areas – hence proposal 5.8.2, which commits the Partnership Board to work with partners ‘...to explore and develop improvements to the collection and use of data, and information on the demand for services and victims'/survivors' needs.’ GLA and MOPAC officers will relay these comments to the Partnership Board, so that it can take account of them in the course of this work and in further needs assessment.

Proposal 5.3: Services' equality, diversity and inclusion policies

- 3.25 In full, proposal 5.3 is 'All services should have, and fully implement in all aspects of their delivery, robust equality, diversity and inclusion policies, including anti-racism policies.'
- 3.26 **Number and profile of respondents:** Eight respondents, 24 per cent of the total and 30 per cent of those who commented on the chapter on overarching issues, commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 5.3

Theme 1: The VAWG Anti-Racism Charter should be adopted and promoted

- 3.27 **Views expressed by consultation respondents:** One respondent suggested that the VAWG Anti-Racism Charter should be adopted and promoted as part of implementing this new duty in London.

- 3.28 **GLA and MOPAC recommendation:** No change. The Mayor will ensure that anti-racism is embodied in his implementation of the Part 4 duties, including commissioning.

Proposal 5.4: Services' provision of interpreters

- 3.29 In full, proposal 5.4 is, 'All services should have, or be able to access, sign language and spoken language interpreters for the survivors they are working with.'

- 3.30 **Number and profile of respondents:** Twelve respondents – 36 per cent of the total and 44 per cent of those who commented on the chapter on overarching issues – commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 5.4

Theme 1: This proposal is welcome

- 3.31 **Views expressed by consultation respondents:** Most respondents who commented on this proposal did not do so in detail, but welcomed its contribution to ensuring more inclusive, accessible services. One noted that it would remove the need for victims/survivors to rely on friends or family to provide interpretation.

Theme 2: Such services should be commissioned on a pan-London basis

- 3.32 **Views expressed by consultation respondents:** Some respondents suggested that interpretation services would be best commissioned on a pan-London basis.
- 3.33 **GLA and MOPAC recommendation:** No change. Although it may well be likely that an interpretation service would sensibly operate on a pan-London basis, there is little benefit in amending the strategy to specify that this should be the case. As it stands, the strategy could support the operation of these services at whatever level a provider deemed practical.

Theme 3: Delivering such services can be challenging

- 3.34 **Views expressed by consultation respondents:** A couple of respondents noted challenges associated with providing interpreters, with one commenting that it is expensive and another that the availability of interpreters is often limited.
- 3.35 **GLA and MOPAC recommendation:** No change. It is undoubtedly the case that it can be challenging to deliver interpretation services. This is part of the reason such services have not been adequately provided to date. The introduction of Part 4 and the associated funding provides a welcome opportunity to ensure that all services have, or offer access to, interpretation services.

Theme 5: This proposal should form a requirement in commissioning frameworks

- 3.36 **Views expressed by consultation respondents:** One respondent suggested this proposal should form a requirement in commissioning frameworks.
- 3.37 **GLA and MOPAC recommendation:** No change. The Mayor would expect services commissioned as part of the Part 4 duties to reflect the proposals in the strategy as appropriate.

Proposal 5.5: Accessibility of information about services and support

- 3.38 In full, proposal 5.5 is 'Information about services and support, and how to access these, should be available in languages and formats that meet survivors' diverse needs.'
- 3.39 **Number and profile of respondents:** Six respondents – 18 per cent of the total and 22 per cent of those who commented on the chapter on overarching issues – commented on this proposal. All of these were organisations.

*Recurring themes in comments on proposal 5.5**Theme 1: This proposal is welcome*

- 3.40 **Views expressed by consultation respondents:** Respondents who commented on this proposal did not do so in detail, but welcomed its contribution to ensuring more inclusive, accessible services.

Proposal 5.6: Support for those with NRPF

- 3.41 In full, proposal 5.6 is 'Wraparound support for those with NRPF should include access to accredited immigration legal advice to support them at all stages of their journey, and the Home Office should fast-track all domestic abuse cases.'
- 3.42 **Number and profile of respondents:** Nineteen respondents – 58 per cent of the total and 70 per cent of those who commented on the chapter on overarching issues – commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 5.6

Theme 1: This proposal is welcome

- 3.43 **Views expressed by consultation respondents:** Respondents who commented on this proposal often did not do so in detail, but registered support for it. Some noted the need for it, in view of the severe shortage of support for victims/survivors with support needs related to their immigration status. Some noted the risks this lack of support creates for victims/survivors, in terms of unnecessarily prolonging stays in supported accommodation and increasing the risk of them returning to perpetrators.

Theme 2: This proposal does not address fundamental problems faced by those with NRPF

- 3.44 **Views expressed by consultation respondents:** A number of respondents noted that this proposal would not, in itself, address some of the fundamental challenges faced by victims/survivors with NRPF. They identified three specific issues. First, some commented that it would not enable victims/survivors to access safe accommodation, with some suggesting that, in order to be effective, it needs to work in tandem with provision for this cohort to access safe accommodation. Second, some commented that the Domestic Abuse Act does little to ensure support for victims/survivors with NRPF. Third, some questioned whether it would address the slowness and complexity of Home Office decision-making, with a number asking how the expectation that it fast-track victims'/survivors' cases would be implemented.
- 3.45 **GLA and MOPAC recommendation:** No change. Although this proposal does not directly enable victims/survivors with NRPF to access safe accommodation, proposals 7.2 and 7.7 address access to crisis accommodation for this cohort. It is beyond the scope of this strategy to address the fundamental problems faced by victims/survivors with NRPF. However, the Mayor has lobbied the government strongly on these issues and will continue to impress upon the Home Office the need for it to fast-track the cases of victims/survivors of domestic abuse.

Theme 3: This proposal should cover a broader cohort

- 3.46 **Views expressed by consultation respondents:** Some respondents recommended that this proposal should cover a broad cohort of victims/survivors whose immigration status may make it difficult for them to access welfare benefits or housing assistance, including EU nationals, whose entitlements are not necessarily clear or well-understood post-Brexit. Some also suggested that support should be available both to those awaiting a decision on an application for the Domestic Violence Destitution Concession and those who have failed to secure it.

- 3.47 **GLA and MOPAC recommendation:** Change. It is not only migrants subject to NRPF conditions who may need this support, so the final version of strategy should specify that this and other references to those with NRPF cover non-UK nationals with no or limited recourse to public funds.

Theme 4: Implementing this proposal may be challenging

- 3.48 **Views expressed by consultation respondents:** A number of respondents noted the challenges that need to be considered in implementing this proposal. These included some victims'/survivors' language barriers or fear of statutory services; the cost of provision, in part because the time taken to resolve immigration issues means that support is often needed for a lengthy period; and a shortage of Legal Aid representatives for immigration cases.
- 3.49 **GLA and MOPAC recommendation:** No change. It is undoubtedly the case that it can be especially challenging to engage victims/survivors with NRPF and resource-intensive to deliver the support they need. This is part of the reason such services have not been adequately provided to date. The introduction of Part 4 and the associated funding provides a welcome opportunity to ensure that victims/survivors with NRPF receive the accredited immigration advice they need. At best, it creates potential to bolster the supply of Legal Aid representatives by creating new demand for them. The GLA and MOPAC expect support for victims/survivors with NRPF to be delivered by services that understand the needs of this cohort, including potential fears of statutory services.

Theme 5: The remit of this proposal needs to be clarified

- 3.50 **Views expressed by consultation respondents:** A couple of respondents urged clarification of the services to which this proposal would apply, specifically whether it would only apply to services commissioned under the duty conferred on the Mayor by Part 4 of the Domestic Abuse Act.
- 3.51 **Views expressed by workshop participants:** Two representatives from local authorities who attended the workshop mentioned at paragraph 2.8 welcomed the focus on victims/survivors with NRPF. However, they also noted that victims/survivors are unlikely to secure longer-term accommodation because of wider barriers they face.
- 3.52 **GLA and MOPAC recommendation:** Clarify. In order to maximise the positive impact of this strategy, it should apply to all of the capital's support services for victims/survivors of domestic abuse based in safe accommodation. This approach seems in keeping with the 2021 Act's specification that Tier 2 authorities should 'cooperate with' Tier 1 authorities in their exercise of the duties conferred upon them by Part 4. Therefore, the final strategy should specify that the proposals it contains are intended to apply to safe accommodation services across the board,

not solely those commissioned with the funding allocated to the Mayor to deliver the new duties conferred on the GLA by Part 4.

Proposal 5.7: Commissioning and smaller and/or specialist providers

- 3.53 In full, proposal 5.7 is, 'Commissioning processes and requirements should not disadvantage smaller and/or specialist providers, including 'by and for' providers, and should support these providers to build their capacity.'
- 3.54 **Number and profile of respondents:** Twelve respondents – 36 per cent of the total and 44 per cent of those who commented on the chapter on overarching issues – commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 5.7

Theme 1: This proposal is welcome

- 3.55 **Views expressed by consultation respondents:** Respondents who commented on this proposal often did not do so in detail, but registered support for it. Some noted the value of such providers, including in providing accessible, effective services for a range of communities. Some noticed that they had often lost out in rounds of commissioning, especially in a context of budget cuts.

Theme 2: Successful implementation depends on a number of factors

- 3.56 **Views expressed by consultation respondents:** A few respondents noted that successful implementation of this proposal would rely on several factors, including funding over and beyond that required for more generic services; an appropriate commissioning framework, potentially encouraging consortia of organisations to collaborate; and supporting providers to build their capacity. One respondent commented that plans for the latter should be outlined in the strategy.
- 3.57 **GLA and MOPAC recommendation:** No change. The commissioning approach through which many of the proposals in this strategy will be implemented recognises the additional funding and other conditions that smaller and/or specialist providers often require.

Theme 3: Such services should be commissioned on a pan-London basis

- 3.58 **Views expressed by consultation respondents:** A few respondents suggested that, where smaller and/or specialist services are commissioned, this should be for delivery of pan-London services.
- 3.59 **GLA and MOPAC recommendation:** No change. Existing patterns of provision demonstrate that individual boroughs do not often commission smaller or specialist

providers. This is unsurprising, given that the number of victims/survivors who may need the culturally-specific services they provide is typically very small at local authority level. The introduction of Part 4 and the associated funding provide a welcome opportunity to support more smaller and specialist providers to deliver such services. Although it is likely that this will take place predominantly at pan-London level, there is little benefit in amending the strategy to specify that this should be the case. Indeed, doing so may limit the scope for a borough or group of boroughs to commission such providers where local needs warrant this.

Proposal 5.8: Partnership Board work on information about services and on need

- 3.60 In full, proposal 5.8 is, 'The Partnership Board should work with partners:
- 5.8.1 to improve the provision of information to survivors about the range of services and support, and how to access these
 - 5.8.2 to explore and develop improvements to the collection and use of data, and information on the demand for services and survivors' needs, including for those who are severely and multiply disadvantaged
 - 5.8.3 to identify the need for and availability of move-on and second-stage accommodation.'
- 3.61 **Number and profile of respondents:** Fourteen respondents – 42 per cent of the total and 52 per cent of those who commented on the chapter on overarching issues – commented on this group of proposals. One of these was an individual, and the rest of these were organisations.
- 3.62 Of these:
- one respondent, an organisation, commented on proposal 5.8.1
 - ten respondents commented on proposal 5.8.2, of whom one was an individual and nine were organisations
 - four respondents, all organisations, commented on proposal 5.8.3.

Recurring themes in comments on proposal 5.8.1

Theme 1: Providers also need improved information about services

- 3.63 **Views expressed by consultation respondents:** Only one respondent commented specifically on this proposal. This respondent suggested that the Partnership Board should work on improving information provision not just to victims/survivors, but also to providers. They suggested this would have the benefit in promoting services' awareness of other provision available for victims/survivors.

- 3.64 **GLA and MOPAC recommendation:** No change. It is for the Partnership Board to determine the scope of this work. However, GLA and MOPAC officers will ensure that the Board is aware of this suggestion

Recurring themes in comments on proposal 5.8.2

Theme 1: This proposal is welcome

- 3.65 **Views expressed by consultation respondents:** Most respondents who commented on this proposal voiced support for this work. They welcomed the opportunity that the Part 4 duty creates for a more systematic and consistent approach to data-gathering that will inform assessments of both need and the effectiveness of different services.

Theme 2: While the focus on those who are multiply disadvantaged is welcome, the Partnership Board should also consider those with NRPF

- 3.66 **Views expressed by consultation respondents:** Several respondents welcomed this proposal's commitment to better understanding the full range of victims'/survivors' needs, especially the needs of those who are severely and multiply disadvantaged. A number noted the barriers that this cohort faces in accessing accommodation, with the result that they often end up in accommodation that does not meet their complex needs. One respondent suggested that this work should also pay particular attention to the needs of victims/survivors with NRPF.

- 3.67 **GLA and MOPAC recommendation:** No change. It is for the Partnership Board to determine the scope of this work. However, GLA and MOPAC officers will ensure that the Board is aware of this suggestion.

Theme 3: The Partnership Board should take various specific considerations into account

- 3.68 **Views expressed by consultation respondents:** Some respondents made specific suggestions on this work, as follows:
- Some recommended data should be broken down by borough and by different needs.
 - Some advised that the Partnership Board draw on existing data sets, such as H-CLIC.
 - Some suggested that the Partnership Board should consider the needs of older victims/survivors and of those traumatised by the removal of children.
 - One respondent noted the risk that data from services does not adequately capture the needs of victims/survivors who are severely and multiply disadvantaged, because they do not necessarily engage with services.

- 3.69 Views expressed by workshop participants and the Partnership Board: One provider who attended the workshop mentioned at paragraph 2.7 above suggested that older women seem to have been overlooked by the strategy.
- 3.70 GLA and MOPAC recommendation: No change. It is for the Partnership Board to determine the scope of this work. However, GLA and MOPAC officers will ensure that the Board is aware of these suggestions.

Recurring themes in comments on proposal 5.8.2

Theme 1: This proposal is welcome

- 3.71 Views expressed by consultation respondents: Of respondents who commented on this proposal, a majority commented that this work would be valuable. Some suggested more detail on plans would be useful or commented on specific considerations that should be taken into account in this work.
- 3.72 GLA and MOPAC recommendation: No change. It is for the Partnership Board to determine the scope of this work.

Theme 2: The full diversity of victims'/survivors' needs must be taken into account

- 3.73 Views expressed by consultation respondents: Two respondents commented that the work needs to take into account the full diversity of victims'/survivors' needs and the intersections between these needs, given the importance of move-on accommodation meeting these needs.
- 3.74 GLA and MOPAC recommendation: No change. It is for the Partnership Board to determine the scope of this work. However, GLA and MOPAC officers will ensure that the Board is aware of these suggestions.

Theme 3: Move-on accommodation can delay moves into independent accommodation

- 3.75 Views expressed by consultation respondents: One respondent expressed concern that move-on accommodation could create additional uncertainty and disruption for victims/survivors, delaying moves into independent accommodation.
- 3.76 GLA and MOPAC recommendation: Clarify. The proposed work relates to the need for move-on accommodation. This implies cases in which such accommodation is necessary and beneficial to victims/survivors, rather than simply delaying them moving them into independent accommodation. This work may help improve understanding of whether, where and how move-on accommodation is being (mis-)used in this way. GLA and MOPAC officers will ensure that the Board

is aware of this comment. However, the introductory text in policy 8 should also make clear that move-on/second-stage are not appropriate in all circumstances.

Proposal 5.9: Funding for culturally-specific services

- 3.77 In full, proposal 5.9 is, 'The Mayor will provide funding for services that are culturally specific, responsive to the needs of different communities and meet survivors' diverse needs.'
- 3.78 Number and profile of respondents: Twelve respondents – 36 per cent of the total and 44 per cent of those who commented on the chapter on overarching issues – commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 5.9

Theme 1: This proposal is welcome

- 3.79 **Views expressed by consultation respondents:** Most of the respondents who commented on this provision welcomed it. Some noted the value and effectiveness of such services in meeting the diverse needs of victims/survivors in London. One highlighted their particular importance for victims/survivors with multiple disadvantage.

Theme 2: Such services should be commissioned on a pan-London basis

- 3.80 Views expressed by consultation respondents: A few respondents suggested that this funding would be best used for pan-London services.
- 3.81 **GLA and MOPAC recommendation:** No change. Existing patterns of provision demonstrate that individual boroughs do not often commission smaller or specialist providers. This is unsurprising, given that the number of victims/survivors who may need the culturally-specific services they provide is typically very small at local authority level. The introduction of Part 4 and the associated funding provide a welcome opportunity to support more smaller and specialist providers to deliver such services. Although it is likely that this will take place predominantly at pan-London level, there is little benefit in amending the strategy to specify that this should be the case. Indeed, doing so may limit the scope for a borough or group of boroughs to commission such providers where local needs warrant this.

Theme 3: Successful implementation depends on a number of factors

- 3.82 **Views expressed by consultation respondents:** A couple of respondents noted, respectively, that additional funding would be required for culturally-specific services and that a commissioning framework that encouraged consortia of

organisations to work together may be valuable in ensuring such services are commissioned.

- 3.83 **GLA and MOPAC recommendation:** No change. The commissioning approach through which many of the proposals in this strategy will be implemented recognises the additional funding and other conditions that smaller and/or specialist providers often require. The commissioning round currently underway is outcomes-based and, as such, is not prescriptive about specific approaches to delivery. However, it does support bids from consortia of providers.

Theme 4: New funding is welcome, but existing services are at risk

- 3.84 **Views expressed by consultation respondents:** One respondent commented that, while new, additional funding and services are welcome, it is concerning that many existing, borough-commissioned services are at risk because their funding is precarious.
- 3.85 **Views expressed by workshop participants and the Partnership Board:** These stakeholders expressed similar views.
- 3.86 **GLA and MOPAC recommendation:** No change. This proposal does not in and of itself imperil existing services. However, it is the case that commissioning budgets for safe accommodation services that sit outside Part 4 are under pressure. The Act's requirement that Tier 2 authorities 'co-operate with' the Tier 1 authority gives the Mayor little leverage to ensure boroughs continue to fund existing services, or to address the disparity between boroughs' investment in such services. In recognition of this, the final version of the strategy should contain an additional proposal in the chapter on overarching issues, for the Local Partnership Board 'to explore how a more equitable approach to funding safe accommodation services across London can be achieved.' Moreover, it should make clear that periodic refreshes of the London Domestic Abuse Safe Accommodation Needs Assessment will include monitoring the level of provision of safe accommodation services in London, including any decommissioning.

Theme 5: Further detail would be welcome

- 3.87 **Views expressed by consultation respondents:** One respondent requested further detail on the funding available and which organisations would be eligible to bid for it.
- 3.88 **GLA and MOPAC recommendation:** No change. This information will be provided as part of the commissioning approach through which many of the proposals this strategy will be implemented.

Proposal 5.10: The Mayor's commissioning and small, specialist providers

- 3.89 In full, proposal 5.10 is, 'The Mayor will ensure that his commissioning processes and requirements do not disadvantage small, specialist and 'by and for' providers, and support capacity-building.'
- 3.90 **Number and profile of respondents:** Thirteen respondents – 39 per cent of the total and 48 per cent of those who commented on the chapter on overarching issues – commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 5.10

Theme 1: This proposal is welcome

- 3.91 **Views expressed by consultation respondents:** Most of the respondents who commented on this provision welcomed it. Some noted the value and effectiveness of such services in meeting the diverse needs of victims/survivors in London.

Theme 2: Capacity building should be detailed and provision for consortia bidding may prove helpful

- 3.92 **Views expressed by consultation respondents:** A couple of respondents commented that smaller, specialist providers would certainly need support to participate in commissioning processes. One suggested that the strategy provides fuller information on the capacity-building to which the strategy commits the Mayor. One highlighted the potential value of a commissioning framework that encouraged consortia of organisations to work together.
- 3.93 **Additional comments from workshop participants and the Partnership Board:** These stakeholders agreed that building monitoring and evaluation capacity within these providers is vital, in part to strengthen their position to evidence bids for funding they may place.
- 3.94 **GLA and MOPAC recommendation:** No change. Because of the government's requirement that Tier 1 authorities use funding allocated to them for meeting new duties in 2021/22 by the end of the financial year, the commissioning through which many of the proposals in this strategy will be implemented is already underway. However, the Mayor's commissioning approach is designed to avoid putting small, specialist and 'by and for' providers at a disadvantage. In addition, the commissioning round currently underway supports bids from consortia of organisations.

Theme 3: Apparent overlap with proposal 5.9

- 3.95 **Views expressed by consultation respondents:** A couple of respondents suggested that this proposal appeared to overlap significantly with proposal 5.9.
- 3.96 **GLA and MOPAC recommendation:** No change. Although linked, proposals 5.9 and 5.10 are distinct. The first commits the Mayor to making funding available for small, specialist and ‘by and for’ providers, while the second commits him to doing so through processes that will ensure they are not disadvantaged, relative to larger organisations with a broader remit.

Other views expressed in comments on overarching issues

- 3.97 **Number and profile of respondents:** Ten respondents – 30 per cent of the total and 37 per cent of those who commented on this policy area – made a comment or comments not specific to one of the proposals. All of these comments came from organisations.

*Recurring themes in other comments on overarching issues**Theme 1: Additional detail is needed, including around implementation*

- 3.98 **Views expressed by consultation respondents:** Some respondents commented that the draft strategy lacks the detail needed to ensure key proposals are clear. One expressed particular concern that single proposals seek to address the diverse needs of a wide range of groups together. One suggested the strategy should include a clear commitment to review services regularly, engaging with providers, boroughs and victims/survivors in doing so, with a view to continuously improving services. Another recommended outlining how implementation will be assessed.
- 3.99 **GLA and MOPAC recommendation:** Clarify. This first Domestic Abuse Safe Accommodation Strategy for London is inevitably relatively high-level, in part because of the limitations of existing data on need and provision and the tight timeframe within which the Mayor had to conduct the needs assessment and develop the strategy. Future needs assessments should yield a fuller understanding of needs, enabling future strategies and commissioning to target these more precisely. Moreover, work to evaluate and review services commissioned under Part 4 forms part of the duty conferred on Tier 1 authorities by the 2021 Act. Related to this, proposal 5.8.2 commits the Local Partnership Board to establish options for better collection and use of data. While it is for the Partnership Board to determine the scope of this work, it could extend to data gathered from services. GLA and MOPAC officers will ensure that the Partnership Board is aware of the comments above. However, the ‘Next steps’ chapter of the

final version of the strategy could helpfully include information on how the Partnership Board will take forward its work.

Theme 2: Future funding and other funding streams are vital to effective implementation

- 3.100 **Views expressed by consultation respondents:** One respondent, a local authority, stressed the importance of both future funding for Part 4 and the allocation of funding through the Mayor's Affordable Homes Programme to effective implementation of the strategy.
- 3.101 **GLA and MOPAC recommendation:** No change. Both future funding for Part 4 duties and the use of complementary funding streams to support the implementation of this strategy are certainly essential to its impact. The Mayor has impressed upon the government the need for sufficient and long-term funding for the GLA to meet the Part 4 duties, and will continue to do so. He is also committed to allocating funding from his Affordable Homes Programme and other capital delivery programmes to support the development of new safe accommodation and improvements to existing safe accommodation.

Theme 3: These proposals do nothing to address disparities in provision

- 3.102 **Views expressed by consultation respondents:** One respondent, a local authority, highlighted concerns about the disparity in boroughs' provision of services. The respondent noted that these proposals do not seem to seek to address this, perpetuating existing inequity.
- 3.103 **GLA and MOPAC recommendation:** Change. The Act's requirement that Tier 2 authorities 'co-operate with' the Tier 1 authority gives the Mayor little leverage to address disparities of provision across different boroughs. However, in recognition of disparities in boroughs' provision of services, the final version of the strategy should contain an additional proposal in the chapter on overarching issues, for the Local Partnership Board 'to explore how a more equitable approach to funding safe accommodation services across London can be achieved.'

Theme 4: The needs of older victims/survivors should be addressed

- 3.104 **Views expressed by consultation respondents:** One respondent, a voluntary/community sector provider of services, commented that the strategy did not consider the needs of older women, who currently often struggle to access services. The respondent noted that needs related to the physical accessibility of safe accommodation and remaining close to health and care services and social networks can be factors here. The respondent recommended developing stronger links with sheltered accommodation to help meet their needs.

- 3.105 **GLA and MOPAC recommendation:** No change. The commissioning approach through which many of the proposals in this strategy will be implemented allows providers to seek funding for services that will meet the needs of older victims/survivors. GLA and MOPAC officers will ensure that the Partnership Board is aware of these comments and can thus take them into account when reviewing London's needs assessment.

4 Policy 6 – Improving early intervention

Overview of comments

- 4.1 The consultation response form asked respondents to comment on the chapter of the strategy on improving early intervention, including specific proposals within it. Twenty-nine respondents – 88 per cent of the total – commented on this chapter. Of these, two were individuals and 27 were organisations. A full break down of responses by respondent type is available at Appendix 3.

Proposal 6.1: All social landlords should have DAHA accreditation

- 4.2 Number and profile of respondents: Twenty-nine respondents commented on this chapter on improving early intervention – 88 per cent of the total and 100 per cent of those who commented on this proposal. Two of these were individuals and 27 organisations.

Recurring themes in comments on proposal 6.1

Theme 1: The proposal is welcome

- 4.3 **Views expressed by consultation respondents:** Many respondents welcomed the proposal. One commented it would help ensure victims/survivors receive non-judgemental responses.

Theme 2: The proposal should be wider in scope

- 4.4 **Views expressed by consultation respondents:** Some respondents felt that this proposal should extend to include local authorities whether or not they own and manage housing stock, in light of their duties relating to homelessness, the allocation of social housing and the regulation of standards in the privately rented sector. Linked to this, one respondent noted the important role that local authority departments, such as Environmental Health, can play in early intervention by identifying those experiencing domestic abuse and directing them to specialist support and services.
- 4.5 **GLA and MOPAC recommendation:** Change. This proposal should be amended to 'All housing associations and boroughs should have DAHA accreditation.' This will ensure that local authorities receive guidance and support in relation to the responsibilities identified by respondents. The strategy should also be amended to reflect the important role of a range of local authority teams in early identification of

domestic abuse, including teams responsible for monitoring and enforcing housing standards.

Theme 3: How the proposal will be implemented needs to be clarified

- 4.6 **Views expressed by consultation respondents:** Two respondents commented that the proposal requires clarification, with one querying how the expectation would be enforced. Another recommended the strategy outline the support that the Local Partnership Board will provide to housing providers to achieve DAHA accreditation.
- 4.7 **GLA and MOPAC recommendation:** No change. The strategy includes a short overview of the areas covered by DAHA accreditation. There is no need to set out full detail, as this is readily available on DAHA's website, www.dahalliance.org.uk. Part 4 does not give the Mayor a basis for 'enforcing' proposals in the strategy that set expectations of other stakeholders, although London boroughs are subject to a duty 'to co-operate' with the GLA in its exercise of its new duties. Ultimately, for the strategy to deliver maximum benefit for victims/survivors of domestic abuse in London, all partners need to work together to implement proposals.

Theme 4: Achieving accreditation will be costly

- 4.8 **Views expressed by consultation respondents:** A couple of respondents, both local authorities, raised concerns about the costs associated with achieving accreditation. One queried whether local authorities will be able to apply for GLA funding to cover the costs of accreditation.
- 4.9 **Views expressed by the Partnership Board:** One member of the Partnership Board stated that they support DAHA accreditation of social landlords. However, they noted that the size of social landlords varies significantly, and questioned whether there would be funding to help smaller registered providers to get accreditation.
- 4.10 **GLA and MOPAC recommendation:** No change. DAHA offers a sliding scale of charges for accreditation and these are not prohibitively high. Moreover, housing providers and local authorities that pursue and secure accreditation can find that the changes they introduce as a result of doing so yield savings.¹

¹ See Gentoo and SafeLives. [Safe at Home](#).

Proposal 6.2: Sanctuary schemes

- 4.11 In full, policy 6.2 is, 'Sanctuary schemes should be available to residents of all boroughs, and meet the standards set out in the DAHA Toolkit.'
- 4.12 **Number and profile of respondents:** Seventeen respondents – 52 per cent of the total and 59 per cent of those who commented on the chapter on improving early intervention – commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 6.2

Theme 1: This proposal requires funding, including funding for physical safety measures

- 4.13 **Views expressed by consultation respondents:** Many respondents, predominantly local authorities, expressed concern about funding for this proposal, requesting clarification of how sanctuary schemes will be funded across London. Some respondents commented that additional, dedicated funding would be required to implement this proposal. In particular, respondents questioned whether there would be a funding stream specifically for installations related to target hardening and access control.
- 4.14 **GLA and MOPAC recommendation:** No change. The funding made available to the GLA to implement the duties conferred on it by Part 4 of the 2021 Act is available to provide support for those in sanctuary schemes. It provides welcome additional funding for this purpose. However, the Part 4 funding cannot be used for target hardening measures.

Theme 2: Broadening access to sanctuary schemes is welcome

- 4.15 **Views expressed by consultation respondents:** Some respondents supported extending the provision of sanctuary schemes to include all victims/survivors, regardless of tenure (and including those in TA) and without any restriction of schemes to victims/survivors at the highest levels of risk.

Theme 3: Sanctuary schemes can be valuable at different stages of a victim's/survivor's journey

- 4.16 **Views expressed by consultation respondents:** A couple of respondents suggested that it is important to note that sanctuary schemes may be useful at various stages of a victim's/survivor's journey. For example, installing sanctuary schemes in a home to which a victim/survivor moves from crisis accommodation can help reduce further risk. It can also be helpful to install schemes in refuges, to help refuge users prepare for the transition back to independent living.

- 4.17 **GLA and MOPAC recommendation:** Clarify. An addition to the strategy acknowledging the potential benefits of sanctuary schemes at different stages of victims'/survivors' journeys would be helpful.

Theme 4: A common standard for sanctuary schemes is welcome

- 4.18 **Views expressed by consultation respondents:** Several respondents expressed support for this proposal's specification that all sanctuary schemes should meet common standards, noting variations in how schemes are implemented (including in what measures are installed) across London.

Theme 5: Disparities in existing provision complicate this proposal

- 4.19 **Views expressed by consultation respondents:** Some respondents highlighted existing disparities in boroughs' funding for sanctuary schemes, noting the resulting potential for boroughs that have invested less to benefit more from funding allocated under Part 4.
- 4.20 **GLA and MOPAC recommendation:** Change. The Act's requirement that Tier 2 authorities 'co-operate with' the Tier 1 authority gives the Mayor little leverage to address the disparity between boroughs' investment in such services. However, the final version of the strategy should contain an additional proposal under the 'tackling overarching issues' policy, for the Local Partnership Board 'to explore how a more equitable approach to funding safe accommodation services across London can be achieved.' Moreover, it should make clear that periodic refreshes of the London Domestic Abuse Safe Accommodation Needs Assessment will include monitoring the level of provision of safe accommodation services in London, including any decommissioning.

Proposal 6.3: Partnership Board work on early intervention

- 4.21 *In full, policy 6.3 is, 'The London Partnership Board should undertake work on early intervention, including:*
- 6.3.1 ensuring consistent high quality for sanctuary schemes is in place across London, and exploring options for providing sanctuary schemes in the private rented sector and for homeowners
 - 6.3.2 improving options for survivors who are social tenants and need to move to another social rented home, or retain their current one, including reviewing the Pan-London Housing Reciprocal scheme
 - 6.3.3 exploring the roll-out across London of the co-location of IDVAs in local authority housing-options services.'

- 4.22 Twenty-two organisations and one individual responded to this proposal: 67 per cent of the total and 76 per cent of those who commented on the chapter on improving early intervention.

Recurring themes in comments on proposal 6.3

Theme 1: This work should take specific considerations into account

- 4.23 **Views expressed by consultation respondents:** Some respondents suggested that this work should take the following specific considerations into account:

- home owners and private rented sector tenants
- the under-served groups listed in proposal 7.2
- the Whole Housing Approach.

- 4.24 **GLA and MOPAC recommendation:** No change. Some of these considerations are already within the scope of this work. First, proposal 9.3.1 refers explicitly to options for home-owners and private sector tenants. Second, both groups will be among those using the housing options services to which proposal 9.3.2 relates. Third, the strategy is underpinned by the Whole Housing Approach. More broadly, it is for the Partnership Board to determine the scope of this work. However, GLA and MOPAC officers will ensure that the Board is aware of these suggestions.

Theme 2: Additional detail would be welcome

- 4.25 **Views expressed by consultation respondents:** One respondent suggested that the strategy should provide more detail on how MOPAC and GLA officers will support the Partnership Board in this work.
- 4.26 **GLA and MOPAC recommendation:** No change. This is yet to be determined, as the Partnership Board scopes this work.

Theme 3: This work is welcome

- 4.27 **Views expressed by consultation respondents:** One respondent commented that this work would be welcome.

Proposal 6.3.1: Quality and availability of sanctuary schemes

- 4.28 In full, policy 6.3.1 is, 'The London Partnership Board should undertake work on early intervention, including... ensuring consistent high quality for sanctuary schemes is in place across London, and exploring options for providing sanctuary schemes in the private rented sector and for homeowners.'

- 4.29 **Number and profile of respondents:** Seven organisations – 21 per cent of all respondents and 24 per cent of respondents that commented on the chapter on early intervention – commented on this proposal.

Recurring themes in comments on proposal 6.3.1

Theme 1: This work should cover specific types of accommodation

- 4.30 **Views expressed by consultation respondents:** Some respondents suggested that this work should seek to extend sanctuary schemes to specific types of accommodation, including TA, asylum support accommodation provided by the Home Office, and refuge or second-stage accommodation.
- 4.31 **GLA and MOPAC recommendation:** No change. It is for the Partnership Board to determine the scope of this work. However, GLA and MOPAC officers will ensure that the Board is aware of these suggestions.

Theme 2: This proposal is welcome and could usefully address charges to home owners

- 4.32 **Views expressed by consultation respondents:** Some respondents commented that this work would be welcome, especially in terms of opening up sanctuary schemes to private sector tenants, who typically face barriers to access. One suggested that it should seek to address the practice of charging home-owners for security measures.
- 4.33 **GLA and MOPAC recommendation:** No change. In relation to the issue of charges for home owners, it is for the Partnership Board to determine the scope of this work. However, GLA and MOPAC officers will ensure that the Board is aware of this suggestion.

Proposal 6.3.2: Improving options for social sector tenants to move

- 4.34 In full, policy 6.3.2 is, 'The London Partnership Board should undertake work on early intervention, including...improving options for survivors who are social tenants and need to move to another social rented home, or retain their current one, including reviewing the Pan-London Housing Reciprocal scheme.'
- 4.35 **Number and profile of respondents:** Eleven organisations and one individual – 36 per cent of respondents and 44 per cent of those that commented on the chapter on early intervention – commented on this proposal.

Recurring themes in comments on proposal 6.3.2

Theme 1: The paucity of options for victims/survivors who are social housing tenants reflects a shortage of supply

- 4.36 **Views expressed by consultation respondents:** Some respondents commented that it is difficult to secure options for victims/survivors who are social housing tenants to move to another social rented home, because of the severe under-supply of social rented housing in London. Some made suggestions for helping victims/survivors with social sector tenancies in this context. One recommended social housing providers should be required to contribute homes to a 'pool' that could be used for victims/survivors. Another advocated setting clearer expectations of housing associations to manage transfer requests from their tenants within their own stock.
- 4.37 **Views expressed by workshop participants:** One local authority who attended the workshop mentioned at paragraph 2.8 questioned the position of boroughs that do not own any housing stock and consequently rely on their nomination rights to housing association stock to offer social housing by way of move-on accommodation.
- 4.38 **GLA and MOPAC recommendation:** The limited supply of social rented housing is undoubtedly the primary factor that makes it difficult to enable victims/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, specific interventions that enable victims/survivors who are social housing tenants to move are welcome. 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. 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.

Theme 2: This proposal is welcome

- 4.39 **Views expressed by consultation respondents:** Several respondents welcomed the proposal, agreeing that the work it covers is absolutely necessary. Some noted that some victims/survivors who are social housing tenants can wait for many years to secure transfers. Others commented that the lack of options means they lose the security and financial value of a social sector tenancy.

Theme 3: The Pan-London Housing Reciprocal Scheme needs to be reviewed

- 4.40 **Views expressed by consultation respondents:** Several respondents specifically welcomed plans to review the Pan-London Housing Reciprocal scheme. Some noted that the scheme is heavily over-subscribed, meaning it takes a very long time for applicants to the scheme to secure alternative social housing. One noted that this can leave victims/survivors feeling that the burden of securing alternative accommodation sits with them and resorting to mutual exchange schemes, with the attendant risk of the perpetrator finding out their new address. One noted that the scheme is under-used by male victims/survivors and suggested that the review consider the scope for making the scheme more accessible to them.
- 4.41 **GLA and MOPAC recommendation:** No change. These comments are broadly supportive of the proposal. It is for the Partnership Board to determine the scope of its review of the Pan-London Housing Reciprocal, but GLA and MOPAC officers will relay these comments to them.

Proposal 6.3.3: Exploring the co-location of IDVAs in housing options service

- 4.42 In full, policy 6.3.3 is, 'The London Partnership Board should undertake work on early intervention, including exploring the roll-out across London of the co-location of IDVAs in local authority housing-options services.'
- 4.43 Ten organisations – 30 per cent of all respondents and 34 per cent of those who commented on the chapter on early intervention – commented on this proposal.

Recurring themes in comments on proposal 6.3.3*Theme 1: This proposal is welcome*

- 4.44 **Views expressed by consultation respondents:** Respondents welcomed this proposal. They noted its capacity to improve services' understanding of domestic abuse and the associated trauma and to help victims/survivors secure better housing options. Some based their comments on the experience of housing options services that already have IDVAs co-located with them. One respondent commented that this option should not just be explored, but implemented, given that it has already been trialled.
- 4.45 **GLA and MOPAC recommendation:** No change. The strategy clearly supports the co-location of IDVAs in housing options services. However, this does represent a significant change for many such services, and the Partnership Board has a valuable role to play in working with local authorities to extend this practice, building on the valuable work already done by some local authorities.

Theme 2: The role of the GLA and MOPAC needs to be clarified

- 4.46 **Views expressed by consultation respondents:** Some respondents made comments related to the role of the GLA and MOPAC in this proposal. One suggested that the Partnership Board had a valuable role to play in sharing and promoting the good practice of local authorities that already have IDVAs co-located in their housing options services. Another invited clarification of how providing IDVAs in housing options services fits within the scope of Part 4.
- 4.47 **GLA and MOPAC recommendation:** No change. The strategy proposes the Partnership Board take on this work because it is well placed to play a coordinating role, including sharing existing good practice. The provision of IDVAs within housing options services does not constitute the provision of support within safe accommodation and so sits outside the scope of Part 4 of the 2021 Act. However, the strategy considers that this approach is critical to helping those who need accommodation-based support services to access them.

Theme 3: This proposal fails to address housing options' services inadequate support for victims/survivors

- 4.48 **Views expressed by consultation respondents:** One respondent commented that this proposal is insufficient to address the 'gatekeeping' practices that victims/survivors can encounter when they seek help from local authority housing options services.
- 4.49 **Views expressed by workshop participants and the Partnership Board:** These stakeholders raised concerns about gatekeeping practices, which they reported can be a particular barrier to young people securing support.
- 4.50 **GLA and MOPAC recommendation:** No change. This proposal is intended to work in tandem with DAHA accreditation, which is intended to improve local authority services' ability to support victims/survivors appropriately. The strategy's commitment to improving the supply and accessibility of safe accommodation also stands to improve the experience that victims/survivors have when seeking help from housing options services, because it will mean that these services have more options and more suitable options to offer victims/survivors.

Proposal 6.4: The Mayor will provide funding to improve and expand early intervention services

- 4.51 **Number and profile of respondents:** Eleven respondents – 33 per cent of the total and 38 per cent of those who commented on the chapter on improving early intervention – commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 6.4

Theme 1: This proposal requires clarification

- 4.52 **Views expressed by consultation respondents:** Some respondents asked for additional detail on this proposal, including the amount of funding available, how to access the funding, and how it can be used.
- 4.53 **GLA and MOPAC recommendation:** No change. This detail is provided as part of the commissioning approach through which many of the proposals in this strategy will be implemented.

Other views expressed in comments on improving early intervention

- 4.54 **Number and profile of respondents:** Eighteen respondents – 55 per cent of the total and 62 per cent of those who commented on this policy area – made a comment or comments not specific to one of the proposals. Of these, 17 were organisations and one was an individual.

Recurring themes in other comments on early intervention

Theme 1: Questions on whether these proposals relate to early intervention

- 4.55 **Views expressed by consultation respondents:** Some respondents questioned whether the proposals covered in this chapter actually relate to early intervention, as at least some of the options and services they cover are explored or used at the point when a victim/survivor might seek to access crisis accommodation. One suggested that the chapter might more accurately be titled 'Improving interventions offered by local authorities and housing associations' or 'Improving interventions for retaining stable and secure accommodation'.
- 4.56 **Views expressed by workshop participants:** One provider who attended the workshop mentioned at paragraph 2.8 noted a focus on crisis rather than early intervention and prevention, while recognising that these stages may overlap.
- 4.57 **GLA and MOPAC recommendation:** Clarify. The strategy should be amended to acknowledge that there is a crucial role for 'early intervention' in the prevention of domestic abuse. It should state that, in the context of the strategy, the term 'early intervention' is being used to mean, for example, the steps that social housing providers can take to help victims/survivors remain in their homes where this is a safe option, or move to alternative social housing, as well as the assistance that local authority housing options services offer to victims/survivors seeking help.

Theme 2: Enabling victims/survivors to retain their homes requires additional measures

- 4.58 **Views expressed by consultation respondents:** Some respondents commented that enabling victims/survivors to retain their homes (where this is a safe option) requires interventions that are not detailed in this chapter in order to be effective. In particular, they commented that this approach requires perpetrators to be excluded from homes and work with a range of stakeholders, such as private landlords, banks and the Department for Work and Pensions (DWP). (Their mention of the DWP reflects its role in determining whether victims/survivors are awarded dual Housing Benefit/the housing costs element of Universal Credit when they move to emergency accommodation while maintaining the home they fled, with the intention of returning there.)
- 4.59 **GLA and MOPAC recommendation:** No change. The exclusion of perpetrators is clearly vital to enabling victims/survivors to remain in their homes safely. However, this sits outside the scope of Part 4 of the 2021 Act. It is covered in the Mayor's VAWG Strategy. GLA and MOPAC officers will relay to the Partnership Board comments about the role of the DWP in supporting dual benefit claims, in relation to the work described in proposal 6.3.2.
- 4.60 **Change.** The strategy should be amended to reflect the role of local authority teams that work with private sector landlords and lettings agents in identifying domestic abuse and referring victims/survivors to support.

5 Policy 7 – Improving access to and the provision of safe crisis accommodation

Overview of comments

- 5.1 The consultation response form asked respondents to comment on the chapter of the strategy on improving the provision of and access to safe accommodation, including specific proposals within it. Thirty-two respondents – 97 per cent of the total – commented on this chapter. Of these, two were individuals and 30 were organisations. A full break down of responses by respondent type is available at Appendix 3.

Proposal 7.1: A respite service should be piloted

- 5.2 **Number and profile of respondents:** Twelve respondents – 36 per cent of the total and 38 per cent of those who commented on the chapter on crisis accommodation – commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 7.1

Theme 1: More detail is needed on this proposal

- 5.3 **Views expressed by consultation respondents:** Several respondents, including both local authorities and organisations from the voluntary/community sector, stated that the strategy should include more detail on the proposed respite service pilot. The details they mentioned included the meaning of the term ‘respite service’, where and when the pilot will take place; for whom it will be designed; and how much funding will be allocated to it. Respondents also suggested including information on previous pilots of such projects.
- 5.4 **Views expressed by workshop participants:** One provider who attended the workshop mentioned at paragraph 2.8 stated that further clarity is needed on what is meant by ‘respite’.
- 5.5 **GLA and MOPAC recommendation:** Clarify. The final strategy should be amended to refer to the current DLUHC-funded Respite Rooms pilot project, which is running in two London boroughs. Beyond that, the detail of any further pilots would be for providers to determine, including through bids for Part 4 funding.

Theme 2: The service should be primarily for those with particular characteristics or needs

- 5.6 **Views expressed by consultation respondents:** Several respondents stated that respite services are or should be targeted primarily at those with protected characteristics and/or multiple disadvantage.
- 5.7 **GLA and MOPAC recommendation:** Clarify. See paragraph 5.5 above.

Theme 3: This proposal is welcome

- 5.8 **Views expressed by consultation respondents:** Many respondents, including local authorities and organisations from the voluntary/community sector, stated that they welcomed this proposal.

Theme 4: Respite schemes can be problematic

- 5.9 **Views expressed by consultation respondents:** A few respondents, all local authorities, expressed concerns about the potential adverse impact of respite services on victims/survivors. They noted that they can create an additional stage in their journeys, delaying the point at which victims/survivors receive the support they need.
- 5.10 **GLA and MOPAC recommendation:** No change. This risk can be managed by ensuring that respite services are used appropriately for victims/survivors who need a safe space, with support, where they can consider their options and plan their next steps.

Proposal 7.2: Increased provision of crisis accommodation, with a focus on under-served groups

- 5.11 In full, proposal 7.2 is, 'The provision of refuge and other safe crisis accommodation, including new specialist accommodation, should be increased, with a particular focus on meeting the needs of the following under-served groups:
- families with more than two children and/or boys aged 12 and older
 - LGBTQ+ survivors
 - male survivors
 - people from BAME communities
 - Deaf and disabled people, including those with a learning disability
 - young people
 - survivors of interpersonal or family violence or those affected by multiple disadvantage
 - those with NRPF.'

- 5.12 Number and profile of respondents: Twenty-one respondents – 64 per cent of the total and 66 per cent of those who commented on the chapter on crisis accommodation – commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 7.2

Theme 1: This proposal is welcome

- 5.13 **Views expressed by consultation respondents:** The majority of respondents welcomed this proposal, in particular its recognition of the needs of under-served groups.
- 5.14 **Views expressed by workshop participants and the Partnership Board.** These stakeholders considered the recognition of the needs of survivors/victims from BAME communities, with NRPF, and with multiple disadvantage especially welcome. They noted that members of the latter group often end up in mixed-sex accommodation that is not suitable for their needs, and can even put them at further risk.

Theme 2: Barriers to access for victims/survivors with NRPF need to be addressed

- 5.15 **Views expressed by consultation respondents:** Several respondents, including local authorities and organisations from the voluntary/community sector, highlighted that there are various barriers to victims/survivors with NRPF accessing safe accommodation. They suggested that the strategy should address this.
- 5.16 **GLA and MOPAC recommendation:** No change. This proposal commits to improving provision of refuge and other safe crisis accommodation for those with NRPF. Such provision will, by definition, address the barriers to access that this cohort undoubtedly faces.

Theme 3: Services must be accessible to those with complex needs

- 5.17 **Views expressed by consultation respondents:** Some respondents highlighted the importance of ensuring that services are accessible to those with substance misuse and mental health problems, or other complex needs.
- 5.18 **GLA and MOPAC recommendation:** No change. This proposal commits to improving provision of refuge and other safe crisis accommodation for those with multiple disadvantage. This term includes those with support needs related to mental health and substance misuse, sometimes in combination with other issues. Such provision will, by definition, need to address the barriers to access that this cohort undoubtedly faces.

Theme 4: The list of under-served groups should be amended/more detail added

- 5.19 **Views expressed by consultation respondents:** A considerable number of respondents suggested changes to the list of under-served groups. Some of these suggestions were mutually exclusive. Suggestions included the following:
- a) Remove male victims/survivors.
 - b) Do more to address the barriers to access faced by male victims/survivors.
 - c) Avoid assuming male victims/survivors are GBQ+.
 - d) Consider transgender and transsexual victims/survivors separately from those who identify as LGBTQ, because trans victims/survivors face difference and often greater barriers to accessing crisis accommodation.
 - e) Add victims/survivors of sexual exploitation and trafficking.
 - f) Add those leaving the criminal justice system.
 - g) Add rough sleepers.
 - h) Add those for whom English is a second language.
 - i) Add those with insecure immigration status, asylum seekers and refugees.
 - j) Add Gypsy, Roma and Traveller communities.
 - k) Add those with needs around substance misuse.
 - l) Avoid the generic term BAME.
- 5.20 **Views expressed by workshop participants and the Partnership Board:** One provider who attended the workshop mentioned at paragraph 2.8, and who is also part of the Partnership Board, commented on the need for the strategy to be more specific about the shortage of accommodation for Deaf and disabled victims/survivors. They noted that one service that provides 15 beds is the only existing accommodation for this cohort; and that there is also only one refuge for victims/survivors with learning difficulties. They also reported that national data shows that disabled victims/survivors do not have access to refuge spaces. They raised concerns about many refuges having processes that discriminate against disabled victims/survivors, because they do not understand how to support them and regard their needs as too complex. They reported that barriers to accessing safe accommodation mean that victims/survivors are sometimes forced into residential care, which can result in re-victimisation. They suggested that the strategy needs to further address accessibility not only in terms of physical access, but also in terms of procedures. They stated a need for inclusion standards, suggesting that a working group could look specifically at this. Finally, they stressed a need for long-term capacity building and support for safe accommodation for Deaf and disabled victims/survivors.

- 5.21 Provider organisations underlined the need for additional provision for young victims/survivors. They noted that this should take account of young people's diverse needs and circumstances: some may be in care, some may be parents, some may experience abuse in family homes. They went on to highlight the importance of considering the distinct needs of young victims/survivors in care.
- 5.22 One member of the Partnership Board clearly stated that they welcome the recognition of LGBTQ+ victims/survivors, noting that LGBTQ+ providers offer wrap-around support.
- 5.23 **GLA and MOPAC recommendation:** These are listed in relation to the points above:
- a-f) No change. The list included in the draft strategy reflects the findings of the needs assessment that informs it. GLA and MOPAC officers will ensure that the Partnership Board is aware of these comments, so that they can take account of them in relation to both the work to which proposal 5.8.2 commits them and further needs assessment. There is scope for providers able to evidence the needs of these groups to seek funding for services for them under the commissioning through which many of the proposals in the strategy will be implemented.
 - g) No change. The strategy already addresses the needs they highlighted. In relation to 'rough sleepers', this cohort is covered by the term 'multiple disadvantage'.
 - h) No change. The strategy already addresses the needs they highlighted. For those for whom English is a second language, barriers to access will be addressed via proposal 5.4.
 - i) No change. The strategy already addresses the needs they highlighted. Those with insecure immigration status are, in view of the clarification detailed at paragraph 3.46, covered by the term 'NRPF'.
 - j) Gypsy, Roma and Traveller communities are covered by the term 'Black and minoritised'.
 - k) Change. The final strategy should add victims/survivors with support needs related to substance misuse to this list of under-served groups
 - l) Change. The final strategy should use the term 'Black and minoritised' instead of BAME.

On Deaf and disabled victims/survivors: Change. The strategy is clear on addressing the needs of Deaf and disabled victims /survivors throughout all stages of the pathway to recovery. However, to help ensure the accessibility of safe accommodation, in the final version of the strategy, a proposal should be added to policy 9 to specify that the design of safe accommodation, including refuges and other crisis accommodation, second-stage and move-on, should meet the needs of disabled victims/survivors.

Proposal 7.3: Enhanced support in refuges and other crisis accommodation

- 5.24 In full, proposal 7.3 is, 'The level of support to people in existing refuges and other safe crisis accommodation should be enhanced, where this would improve outcomes. This could include floating support that can be delivered across several services, a borough or group of boroughs, such as young people's support workers.'
- 5.25 **Number and profile of respondents:** Ten respondents – 30 per cent of the total and 31 per cent of those who commented on the chapter on crisis accommodation – commented on this proposal. One of these was an individual and nine were organisations.

Recurring themes in comments on proposal 7.3

Theme 1: Floating support is vital

- 5.26 **Views expressed by consultation respondents:** The most commonly expressed view, articulated by various types of respondent, was that floating support is vital. It helps ensure continuity when victims/survivors enter or leave accommodation.
- 5.27 **GLA and MOPAC recommendation:** No change. This proposal relates primarily to support for those within refuges and other crisis accommodation. Its assumption is that floating support may be helpful in ensuring that residents are able to access support that is specific to their needs. The strategy addresses the type of support described in these comments, for those who move out of refuges, in proposal 8.3.

Theme 2: Enhanced support improves outcomes

- 5.28 **Views expressed by consultation respondents:** Some respondents, all local authorities, stated that enhanced support does increase the likelihood of positive outcomes for victims/survivors.

Theme 3: This proposal will help ensure continuity of support when victims/survivors move

- 5.29 **Views expressed by consultation respondents:** Two respondents – one local authority and one individual – commented that this proposal would prove valuable in scenarios where a victim/survivor is relocated to another borough that cannot provide support. They noted that it would help ensure continuity of support beyond borough boundaries.
- 5.30 **GLA and MOPAC recommendation:** No change. This proposal relates primarily to support for those within refuges and other crisis accommodation. Its assumption

is that floating support may be helpful in ensuring that residents are able to access support that is specific to their needs. The strategy addresses the type of support described in these comments, for those who move out of refuges, is addressed by proposal 8.3.

Theme 4: Floating support is valuable in providing support to children and young people

- 5.31 **Views expressed by consultation respondents:** A couple of respondents – one a local authority and the other a voluntary/community sector organisation – commented that floating support is a valuable means of providing support to children and young people.

Theme 5: Floating support should be available longer-term, as needed

- 5.32 **Views expressed by consultation respondents:** One local authority highlighted the need for floating support services that provide longer-term support victims/survivors who have left refuges can dip in and out of, as and when they need it.
- 5.33 **GLA and MOPAC recommendation:** No change. This proposal relates primarily to support for those within refuges and other crisis accommodation. Its assumption is that floating support may be helpful in ensuring that residents are able to access support that is specific to their needs. The strategy addresses the type of support described in these comments, for those who move out of refuges, in by proposal 8.3.

Proposal 7.4: Support for victims/survivors in temporary accommodation (TA)

- 5.34 In full, proposal 7.4 is, 'Specialist support should be available to survivors and their children placed by boroughs in generic temporary accommodation.'
- 5.35 **Number and profile of respondents:** Thirteen respondents – 39 per cent of the total and 41 per cent of those who commented on the chapter on crisis accommodation – commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 7.4

Theme 1: Concerns about the suitability of TA for victims/survivors

- 5.36 **Views expressed by consultation respondents:** Several respondents, including local authorities and organisations from the voluntary/community sector, expressed concerns about the suitability of TA for victims/survivors. They also suggested that there should be a standard for what is considered safe and suitable accommodation for victims/survivors placed in generic TA.
- 5.37 **GLA and MOPAC recommendation:** No change. This proposal does not advocate the use of generic TA for victims/survivors. Rather, given the reality that many victims/survivors end up in TA, it seeks to ensure that they receive appropriate support there. Over time, this strategy and the Mayor's ongoing exercise of the responsibilities conferred by Part 4 of the 2021 Act should reduce the frequency with which victims/survivors are accommodated in TA only because they are unable to access safe accommodation that meets their needs. It is outside the scope of the Mayor's powers to set requirements for the standard of TA – something that is covered in both legislation and guidance on local authorities' responsibilities to homeless households and in voluntary approaches agreed by London local authorities, such as Setting the Standard.

Theme 2: Better coordination between homelessness and domestic abuse services is needed

- 5.38 **Views expressed by consultation respondents:** Some respondents noted that there is a poor coordination between crisis accommodation provided by the voluntary/community sector and statutory services, which means that some victims/survivors are placed in generic TA when there may have been places available in refuges or other specialist accommodation. They highlighted the need for better coordination between the domestic abuse and homelessness sectors to reduce the frequency with which this happens.
- 5.39 **GLA and MOPAC recommendation:** No change. This strategy and the associated funding create a welcome opportunity for improved coordination of safe accommodation services in London. In combination with the potential co-location of IDVAs in local authority housing options services (proposal 6.3.3) and the single point of access (proposal 7.7), this should help increase opportunities for victims/survivors seeking assistance from local authorities because they are facing or experiencing homelessness as a result of domestic abuse to access safe accommodation.

Theme 3: TA should be included in the scope of Part 4

- 5.40 **Views expressed by consultation respondents:** Three respondents, two from local authorities and one from a voluntary/community sector organisation, objected to the exclusion of TA from the definition of 'safe accommodation', especially given that it is very often the only accommodation available for victims/survivors.
- 5.41 **GLA and MOPAC recommendation:** Change. 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. In the final version of the strategy, proposal 7.4 should be amended to note that he will continue to do so. Meanwhile, efforts to increase the supply and accessibility of safe accommodation should reduce the frequency with which victims/survivors are accommodated in TA when safe accommodation would better meet their needs.

Proposal 7.5: Greater diversity of crisis accommodation

- 5.42 In full, proposal 7.5 is, 'There should be a greater range of safe crisis accommodation, to meet diverse need. This should include an expansion of Housing First and piloting host-care provision for survivors of domestic abuse.'
- 5.43 Number and profile of respondents: Ten respondents – 30 per cent of the total and 31 per cent of those who commented on the chapter on crisis accommodation – commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 7.5*Theme 1: Concerns about the host-care model*

- 5.44 **Views expressed by consultation respondents:** Many respondents, including local authorities and organisations from the voluntary/community sector, expressed concerns about the host-care model. They suggested it may put the host and their family at risk and does not offer the same level of support as a refuge. Some noted that the model was originally developed for those with learning disabilities and other support needs, rather than for victims/survivors of domestic abuse, whose support needs are typically more complex.
- 5.45 **Views expressed by workshop participants:** One provider who attended the workshop mentioned at paragraph 2.8 raised similar concerns. They noted that this model was proposed in Lewisham in 2018, and that both Refuge and Lewisham Council raised concerns about it.

- 5.46 **GLA and MOPAC recommendation:** No change. This proposal commits to *piloting* host-care provision, which would establish whether and in what circumstances this model can meet the needs of some victims/survivors. All services funded through the Mayoral commissioning that will implement many of the proposals in the strategy will need to demonstrate that they ensure the physical and psychological safety of victims/survivors.

Theme 2: Further evidence on need and information on these models is needed

- 5.47 **Views expressed by consultation respondents:** Three respondents, two of them from the voluntary/community sector organisations, highlighted the need for further evidence on demand for these types of accommodation and information on how such models would work.
- 5.48 **GLA and MOPAC recommendation:** No change. The Pan-London Needs Assessment will be refreshed on a regular basis.

Theme 3: This proposal is welcome in meeting diverse need, including multiple disadvantage

- 5.49 **Views expressed by consultation respondents:** Two respondents from the voluntary/community sector welcomed this proposal, recognising the need for a greater range of safe crisis accommodation that responds to the diversity of need, including multiple disadvantage.
- 5.50 **Views expressed by workshop participants:** One respondent from the voluntary/community sector commented that, although Housing First has a crucial role to play in providing safe accommodation and support for victims/survivors experiencing multiple disadvantage, it should be considered a permanent, long-term housing option.
- 5.51 **GLA and MOPAC recommendation:** No change. Housing First is predicated on providing accommodation and support for as long as it is needed.

Proposal 7.6: Crisis accommodation for victims/survivors with NRPF

- 5.52 In full, proposal 7.6 is, 'Survivors with NRPF should be able to access crisis safe accommodation, where finances are in place and they meet other access criteria.'
- 5.53 Number and profile of respondents: Thirteen respondents – 39 per cent of the total and 41 per cent of those who commented on the chapter on crisis accommodation – commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 7.6

Theme 1: This proposal needs to be clarified

- 5.54 **Views expressed by consultation respondents:** Several respondents, including local authorities and organisations from the voluntary/community sector, requested clarification of what finances would need to be in place and of what the access criteria that would be used. Linked to this, one respondent, a local authority, suggested that the strategy should direct Part 4 funding to local authorities' social care services to cover the costs of accommodation and subsistence for NRPF victims/survivors.
- 5.55 **GLA and MOPAC recommendation:** No change. There are a number of potential sources of finance for victims/survivors with NRPF. These include the Domestic Violence Destitution Concession. Some may be accommodated because safe accommodation providers secure the funding required to accommodate victims/survivors with NRPF without other sources of funding. Consequently, it is difficult to be more specific in this proposal.

Theme 2: Accommodation should be available for all victims/survivors with NRPF

- 5.56 **Views expressed by consultation respondents:** Several respondents stated that accommodation should be made available for all NRPF victims/survivors. A couple commented that the proposal does no more than reflect the status quo and that, to make sure that victims/survivors with NRPF do not continue to be refused access to safe accommodation, there needs to be a strategy in place for supporting such victims/survivors.
- 5.57 **GLA and MOPAC recommendation:** No change. The changes needed to significantly improve the position for NRPF victims/survivors are beyond the powers of the Mayor. That is why, as set out in the strategy, he is lobbying government on these. Moreover, the funding associated with this strategy creates new opportunities for providers to deliver services that accommodate victims/survivors with NRPF, including those who do not have funding to cover the housing costs of safe accommodation in place.

Theme 3: Dedicated funding streams are needed for victims/survivors with NRPF

- 5.58 **Views expressed by consultation respondents:** Three local authorities highlighted the need for dedicated funding streams and commissioning of services for victims/survivors with NRPF.
- 5.59 **GLA and MOPAC recommendation:** No change. The funding associated with this strategy makes available funding to support victims/survivors with NRPF. The

funding model is outcomes-based, so does not allocate specific sums to particular types of service.

Proposal 7.7: Single point of entry for victims/survivors with NRPF or multiple disadvantage

- 5.60 In full, proposal 7.7 is, 'There should be a new pan-London single point of entry (that is, provision via a single organisation) to safe accommodation for survivors with NRPF and/or multiple disadvantage.'
- 5.61 **Number and profile of respondents:** Eighteen respondents – 55 per cent of the total and 56 per cent of those who commented on the chapter on crisis accommodation – commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 7.7

Theme 1: This proposal's potential to make access fairer and more transparent is welcome

- 5.62 **Views expressed by consultation respondents:** Two respondents, both local authorities, welcomed this proposal, commenting on its potential to promote fairer, more transparent access to safe accommodation across London. One respondent, an organisation from voluntary/community, welcomed the proposal's specific reference to women with multiple disadvantage, whom it noted are often overlooked.

Theme 2: Concerns about ensuring parity between boroughs

- 5.63 **Views expressed by consultation respondents:** Two respondents, both local authorities, questioned how the GLA will ensure parity between boroughs, given that they will experience different levels of demand on their services.
- 5.64 **GLA and MOPAC recommendation:** No change. This proposal is focused on reducing barriers to access for victims/survivors, rather than on boroughs having equal access. In practice, a borough with a higher level of demand from victims/survivors will secure more accommodation places through the proposed single point of access than one with a lower level.

Theme 3: Concerns about a single provider's capacity

- 5.65 **Views expressed by consultation respondents:** One respondent, a local authority, questioned whether a single provider organisation would be able to meet the diverse needs of those with NRPF and/or experiencing multiple disadvantage.

Another recommended commissioning a consortium of providers to operate this service would ensure if offered a range of expertise and specialisms.

- 5.66 **GLA and MOPAC recommendation:** No change. This proposal does not envisage that a single provider would be responsible for supporting victims/survivors from both these cohorts once they accessed accommodation, but rather than a single service would be responsible for coordinating their access to safe accommodation. The commissioning arising from this strategy accepts bids from consortia, where there is a lead bidder.

Proposal 7.8: Satellite accommodation with support for larger family groups

- 5.67 In full, proposal 7.8 is, 'There should be satellite accommodation with wraparound support, to enable larger family groups to remain in the same locality safely.'
- 5.68 Two organisations commented on this proposal, with a range of comments.

Recurring themes in comments on proposal 7.8

Theme 1: Clusters of accommodation may be challenging to secure

- 5.69 **Views expressed by consultation respondents:** One respondent questioned whether 'satellite accommodation' refers to groups of dwellings in close proximity. They noted that this arrangement will be hard to achieve.
- 5.70 **GLA and MOPAC recommendation:** No change. This proposal does not assume that 'satellite accommodation' should necessarily be provided in clusters. This accommodation would consist of mainstream homes, away from refuge premises, but with refuges providing wraparound support to victims/survivors living there.

Theme 2: Rehousing in the local area may well be unsafe

- 5.71 **Views expressed by consultation respondents:** One local authority expressed a concern that even with support, rehousing in the same locality is likely to be unsafe.
- 5.72 **GLA and MOPAC recommendation:** No change. All safe accommodation should only accept referrals where victims/survivors can be accommodated safely.

Theme 3: Potential overlap with proposal 7.4

- 5.73 **Views expressed by consultation respondents:** One respondent commented that this proposal seems to duplicate 7.4.

- 5.74 **GLA and MOPAC recommendation:** No change. These homes would not be generic TA (the subject of proposal 7.4). They would instead form part of the accommodation where some refuges could place and support victims/survivors. It may be that this sort of safe accommodation would meet the needs of families who might otherwise end up in generic TA.

Theme 4: Scope to reference the Gypsy, Roma, and Traveller communities

- 5.75 Views expressed by consultation respondents: One respondent questioned whether needs of the Gypsy, Roma and Traveller communities should be specifically referenced in this proposal.
- 5.76 **GLA and MOPAC recommendation:** No change. It may be that this sort of satellite provision would benefit victims/survivors from communities that often have larger families, among them Gypsy, Roma and Traveller communities. However, there is no clear benefit to the proposal referencing these communities.

Proposal 7.9: Borough in-reach services to plan moves

- 5.77 In full, proposal 7.9 is, 'The provision of borough in-reach services to plan onward moves for those in safe crisis accommodation should be enhanced.'
- 5.78 **Number and profile of respondents:** Five respondents – 15 per cent of the total and 16 per cent of those who commented on the chapter on crisis accommodation – commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 7.9

Theme 1: This proposal needs clarification

- 5.79 **Views expressed by consultation respondents:** Two respondents, both organisations from the voluntary/community sector, requested clarification of what borough in-reach services entail and how the proposal will be implemented, including how much funding will be available for such services. In particular, they questioned whether in-reach provision could include IDVAs and Mobile Advocates.
- 5.80 **GLA and MOPAC recommendation:** Change. This proposal relates primarily to planning move-on from crisis accommodation. For clarity, it should be combined with proposal 8.1 in the draft strategy to create a new proposal 7.9, as follows:

'Move-on from crisis accommodation should be planned well in advance. This should include assessing the housing and support needs of victims/survivors and their children, and effective communication between boroughs where they have moved to a different area. To help achieve this, the provision of domestic abuse

referral pathway coordinators within boroughs should 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.'

Theme 2: This proposal is welcome

- 5.81 **Views expressed by consultation respondents:** Two respondents, one local authority and one voluntary/community sector organisation, welcomed this proposal.

Theme 3: A shortage of affordable move-on accommodation is the primary barrier to move-on

- 5.82 **Views expressed by consultation respondents:** One respondent, a local authority, commented that the main barrier to onward moves is the shortage of affordable move-on accommodation that meets victims'/survivors' needs.
- 5.83 **GLA and MOPAC recommendation:** No change. The shortage of both safe accommodation for move-on and general needs accommodation that is affordable to victims/survivors is undoubtedly a key obstacle to move-on from crisis accommodation. The Mayor is committed to increasing the supply of safe accommodation for move-on through proposals outlined in the chapter of this strategy that covers move-on and second stage accommodation and resettlement support. He is also working to increase the supply of affordable housing through his planning policies and Affordable Homes Programmes. Meanwhile, the shortage of accommodation for move-on underlines the need for careful planning where victims/survivors are preparing to move-on.

Proposal 7.10: Partnership Board work to share good practice and learning

- 5.84 In full, proposal 7.10 is, 'The London Partnership Board should ensure that good practice and learning from evaluations and pilots is shared across delivery partners, so that continuous improvement and learning is developed.'
- 5.85 Two organisations commented on this proposal.

Recurring themes in comments on proposal 7.10

Theme 1: Service user feedback should inform service design and commissioning

- 5.86 **Views expressed by consultation respondents:** One respondent commented that service user feedback should be taken into account in the design and commissioning of services.

- 5.87 **GLA and MOPAC recommendation:** No change. Because of the government's requirement that Tier 1 authorities use funding allocated to them for meeting new duties in 2021/22 by the end of the financial year, a £12.4 million commissioning round is already underway. It is structured around specified outcomes that reflect London's draft strategy, which in turn reflected engagement with survivors (see paragraph 1.8). However, GLA and MOPAC officers will ensure that the Partnership Board is aware of this suggestion and thus able to take it into account when planning future commissioning.

Proposal 7.11: Mayoral funding for crisis accommodation

- 5.88 *In full, proposal 7.11 is, 'The Mayor will provide funding to improve the provision of and access to safe crisis accommodation.'*
- 5.89 **Number and profile of respondents:** Nine respondents – 27 per cent of the total and 28 per cent of those who commented on the chapter on crisis accommodation – commented on this proposal. Of these one was an individual and eight were organisations.

Recurring themes in comments on proposal 7.11

Theme 1: This proposal is welcome

- 5.90 **Views expressed by consultation respondents:** Some of the respondents who commented on this proposal welcomed the Mayor's commitment to providing this funding.

Theme 2: This proposal requires clarification

- 5.91 **Views expressed by consultation respondents:** Some respondents – two local authorities and one organisation from the voluntary/community sector – requested clarity on the amount of funding available, whether further funding from central government is expected, and the timeframe within which this proposal will be met.
- 5.92 **Views expressed by workshop participants:** One local authority who attended the workshop mentioned at paragraph 2.8 requested clarification of capital funding available via the Mayor's Affordable Housing Programmes. They also questioned whether this funding is separate from funding for support services funded in line with Part 4.
- 5.93 **GLA and MOPAC recommendation:** No change. A total of up to £12.4m is available through the first round of commissioning arising from the strategy, which is already under-way. This commissioning is structured around specified outcomes, rather than identifying specific sums for specific services. Subject to confirmation from the government of further Part 4 funding for 2022-23 and

beyond, further funding will be made available to support proposals set out in the strategy. The Mayor has made clear to the government that this funding needs to be sufficient to meet London's needs and to cover a period of time that will support a longer-term, strategic approach to commissioning. Detail on funding available through the Mayor's Affordable Housing Programmes is available in funding guidance.

Theme 3: This proposal should seek to address disparity in boroughs' provision and risks to existing provision

- 5.94 **Views expressed by consultation respondents:** Some respondents, all local authorities, commented that this policy should consider how to address both disparities in boroughs' existing provision and risks to that provision, given the precarity of current funding.
- 5.95 **Views expressed by the workshop participants and the Partnership Board:** Local authority representatives also raised these concerns, with some suggesting that refuge provision would ideally be managed nationally.
- 5.96 **GLA and MOPAC recommendation:** Change. This proposal does not in and of itself imperil existing services. However, it is the case that commissioning budgets for safe accommodation services that sit outside Part 4 are under pressure. The Act's requirement that Tier 2 authorities 'co-operate with' the Tier 1 authority gives the Mayor little leverage to ensure boroughs continue to fund existing services, or to address the disparity between boroughs' investment in such services. However, in recognition of these disparities, the final version of the strategy should contain an additional proposal in the chapter on overarching issues, for the Local Partnership Board 'to explore how a more equitable approach to funding safe accommodation services across London can be achieved.' Moreover, it should make clear that periodic refreshes of the London Domestic Abuse Safe Accommodation Needs Assessment will include monitoring the level of provision of safe accommodation services in London, including any decommissioning.

Other views expressed in comments on crisis accommodation

- 5.97 **Number and profile of respondents:** Seventeen respondents – 52 per cent of the total number and 53 per cent of those who commented on this policy area – made a comment or comments not specific to one of the proposals. The bulk of these comments came from organisations.

Recurring themes in other comments on crisis accommodation

Theme 1: Fails to recognise limited move-on options are a key barrier to victims/survivors accessing crisis accommodation

5.98 **Views expressed by consultation respondents:** One respondent stressed that this chapter covers the difficulties caused by the time it takes for people to access services, but does not fully address the issue of limited access to long-term housing for victims/survivors, despite this being a reason it takes victims/survivors so long to access services.

5.99 **GLA and MOPAC recommendation:** Change. The proposals in this chapter should include a proposal, incorporating proposal 8.1 in the draft strategy, that addresses improving access to move-on accommodation, as follows:

'Move-on from crisis accommodation should be planned well in advance. This should include assessing the housing and support needs of victims/survivors and their children, and effective communication between boroughs where they have moved to a different area. To help achieve this, the provision of domestic abuse referral pathway coordinators within boroughs should 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.'

The following chapter of the strategy also covers the issue of move-on and includes commitments to increase the availability and accessibility of move-on and second-stage accommodation.

Theme 2: A pan-London single point of entry service for LGBTQ+ victims/survivors would also be welcome

5.100 **Views expressed by consultation respondents:** One local authority suggested that there should be a pan-London single referral pathway for LGBTQ+ victims/survivors, similar to the proposal of a single referral pathway for NRPF. This should be delivered by a consortium of LGBTQ+ 'by and for' services. The respondent suggested that a consortium would be better placed to meet LGBTQ+ victims'/survivors' multiple needs.

5.101 **GLA and MOPAC recommendation:** No change. The Mayor recognises, in proposal 7.2, the need for additional crisis accommodation for LGBTQ+ victims/survivors. This proposal is in line with the pan-London needs assessment. It was less apparent from that needs assessment that this cohort of victims/survivors faced the same barriers to accessing accommodation as victims/survivors with NRPF or multiple disadvantage. However, GLA and MOPAC

officers will relay this suggestion to the Partnership Board for consideration in relation to further needs assessment.

6 Policy 8 – Improving access to and the provision of move-on and second-stage accommodation, and resettlement support

Overview of comments

- 6.1 The consultation response form asked respondents to comment on the chapter of the strategy on improving the provision of and access to move-on and second-stage accommodation, and resettlement support, including specific proposals within it. Twenty-seven respondents – 82 per cent of the total – commented on this chapter. Of these, one was an individual and 26 were organisations. A full break down of responses by respondent type is available at Appendix 3.

Proposal 8.1: Planning move-on accommodation

- 6.2 In full, policy 8.1 is, 'Move-on from crisis accommodation should be planned well in advance. This should include assessing the housing and support needs of the survivor and any children. To help achieve this, the provision of domestic abuse referral pathway coordinators within boroughs should be enhanced, with boroughs working on an in-reach basis with refuges, and other safe crisis accommodation, to manage pathways out and identify suitable move-on accommodation.'
- 6.3 **Number and profile of respondents:** Eleven respondents – 33 per cent of the total and 41 per cent of those who commented on the chapter on move-on accommodation and resettlement support – commented on this proposal. Of these one was an individual and ten were organisations.

Recurring themes in comments on proposal 8.1

Theme 1: Planning for move-on from crisis accommodation is needed, should be done by local authorities and address various specific considerations

- 6.4 **Views expressed by consultation respondents:** Respondents agreed that planning for move-on from crisis accommodation is needed. They commented that moves should be trauma-informed, and special consideration should be given to victims who have additional vulnerabilities, such as young people. They also noted that local authorities should manage such planning.

- 6.5 **GLA and MOPAC recommendation:** No change. The shortcomings of move-on planning at present are already acknowledged in the draft strategy, and the proposal emphasises the role of referral pathway coordinators within boroughs to assess and manage the provision of suitable move-on accommodation based on the assessed support needs of the victim/survivor and any children.

Theme 2: Move-on accommodation should be suitable for victims'/survivors' needs

- 6.6 **Views expressed by consultation respondents:** Respondents commented that move-on accommodation must be suitable for victims'/survivors' needs. They observed that generic hostels and shelters are often poorly equipped to meet the needs of women and girls affected by violence. They also noted that victims/survivors with disabilities should be provided with accessible accommodation, and that all victims/survivors should feel safe and secure.
- 6.7 **GLA and MOPAC recommendation:** Change. The proposal already specifies that move-on accommodation should be 'suitable'. Planning move-on well in advance will help ensure that needs are identified and met. However, it would be helpful for the chapter on the quality of safe accommodation to include a new policy specifying that the design of safe accommodation, including move-on accommodation, should meet the needs of disabled victims/survivors.

Proposal 8.2: Additional move-on accommodation, including for specific groups

- 6.8 In full, policy 8.2 is, 'The provision of move-on and second-stage accommodation should be expanded. This should include developing new move-on pathways for specific groups, informed by those provided for LGBTQ+ survivors, as set out above.'
- 6.9 **Number and profile of respondents:** Eleven respondents – 33 per cent of the total and 41 per cent of those who commented on the chapter on move-on accommodation and resettlement support – commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 8.2

Theme 1: The proposal should include more detail

- 6.10 **Views expressed by consultation respondents:** Respondents wanted more detail on how specifically provision of move-on and second-stage accommodation would be 'expanded' – especially given the commensurate lack of detail in proposal 8.4.

- 6.11 **GLA and MOPAC recommendation:** Change. The strategy already outlines how revenue funding for additional services will be available through the commissioning that will implement many of its proposal and capital funding through the Mayor's Affordable Homes Programmes. Further detail on revenue funding is and will be available as part of commissioning rounds. However, it would be helpful for the final version of the strategy to include further commentary and a proposal on how registered providers of social housing can and should partner with service provider to deliver new and improve existing accommodation.

Theme 2: Move-on accommodation for those of different abilities and disabilities must be expanded

- 6.12 **Views expressed by consultation respondents:** There is a lack of adapted accommodation, or a pipeline of new-build accommodation, that is accessible and customised accommodation for those with physical disabilities, and those who are Deaf or blind.
- 6.13 **GLA and MOPAC recommendation:** Change. The final version of the strategy should include a new policy, related to the quality of safe accommodation, specifying that its design, including the design of move-on accommodation, should meet the needs of disabled victims/survivors.

Theme 3: The stability of accommodation is an important consideration

- 6.14 **Views expressed by consultation respondents:** Many victims/survivors value minimal further disruption when moving on from crisis accommodation.
- 6.15 **GLA and MOPAC recommendation:** No change. Move-on accommodation should be used when appropriate, where victims/survivors require continuing support. In other cases, moving directly to independent accommodation, with appropriate support, may be the best option for victims/survivors who no longer require supported accommodation.

Proposal 8.3: Resettlement support

- 6.16 In full, policy 8.3 is, 'Resettlement support should be available for those moving on from refuges and other safe accommodation for a minimum of three months, including wraparound support provided by the accommodation provider where possible. Resettlement packages should include transport, utility connections, white goods (where not available) and all basic requirements.'
- 6.17 **Number and profile of respondents:** Thirteen respondents – 48 per cent of the total and 39 per cent of those who commented on the chapter on move-on accommodation and resettlement support – commented on this proposal. Of

these, one was an individual and 12 were organisations.

Recurring themes in comments on proposal 8.3

Theme 1: Resettlement support should be a priority for commissioning

- 6.18 **Views expressed by consultation respondents:** Funding for wraparound support and resettlement packages is essential to service delivery, with services designed to meet needs across London. The strategy should clarify whether those with NRPF living in refuges, with their places funded by the Home Office, should be eligible.
- 6.19 **GLA and MOPAC recommendation:** No change. It is difficult to include a single statement on the eligibility of those with NRPF within this proposal, because of the diversity of this cohort and, in many cases, the complexity of their situations. Eligibility would need to be confirmed on a case-by-case basis.

Theme 2: Services should meet needs that endure beyond resettlement

- 6.20 **Views expressed by consultation respondents:** Victims/survivors often have additional support needs following moving home and may need to dip into and out of support.
- 6.21 **GLA and MOPAC recommendation:** No change. The strategy is clear that support is required at different stages of the pathway to resettlement and full recovery of victims/survivors. This is conveyed in the first of the Mayor's six objectives for London's strategy.

Theme 3: Flexible funding is helpful to resettlement

- 6.22 **Views expressed by consultation respondents:** Some respondents commented that flexible funding forms a valuable part of resettlement support. This recently piloted approach provides funding that victims/survivors can access to help with costs such as deposits, white goods or basic items for the home.
- 6.23 **GLA and MOPAC recommendation:** No change. There is scope for providers to bid for funding for resettlement support through the commissioning approach that will implement many of the proposals in this strategy. GLA and MOPAC officers will also relay this observation to the Partnership Board, so that they can take it into account for future needs assessment.

Additional comments from the workshop participants

- 6.24 **Views expressed by workshop participants:** Two local authorities who attended the workshop mentioned at paragraph 2.8 welcomed the resettlement support proposal as they consider it critical.

Proposal 8.4: Mayoral funding for move-on and second-stage accommodation and resettlement support

- 6.25 In full, policy 8.4 is, 'The Mayor will provide funding to improve the provision of and access to move-on and second-stage accommodation, and resettlement support.'
- 6.26 **Number and profile of respondents:** Nine respondents – 27 per cent of the total and 33 per cent of those who commented on the chapter on move-on accommodation and resettlement support – commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 8.4

Theme 1: This proposal needs to be clarified

- 6.27 **Views expressed by consultation respondents:** Specific details of the funding available are not provided. It would be useful to understand which organisations are eligible for funding, and the timeframe within which it will be allocated.
- 6.28 **Views expressed by workshop participants:** One local authority who attended the workshop mentioned at paragraph 2.8 asked for further clarity on whether the funding for move-on and second-stage accommodation is from the commissioning round currently underway, or whether more funds will be released at a later date.
- 6.29 **GLA and MOPAC recommendation:** No change. This is covered by the documentation for the commissioning round currently under-way and will be covered in documentation for future commissioning.

Other views expressed in comments on improving the provision of and access to move-on and second-stage accommodation, and resettlement support

- 6.30 **Number and profile of respondents:** Twelve respondents – 36 per cent of the total and 44 per cent of those who commented on the chapter on move-on accommodation and resettlement support – made a comment or comments not specific to one of the proposals. All of these comments came from organisations.

Recurring themes in other comments on crisis accommodation

Theme 1: The private rented sector can play a crucial role in move-on

- 6.31 **Views expressed by consultation respondents:** Some respondents noted that non-specialist accommodation, including both self-contained and shared accommodation within the private rented sector, can and does play an important part in enabling victims/survivors to move on from crisis accommodation. They felt this should be acknowledged in the strategy, with some suggesting that there would be value in establishing a 'pool' of landlords who would be willing to let to victims/survivors. They commented that it is challenging to secure private rented sector tenancies for victims/survivors because Local Housing Allowance rates are set well below most rents in the sector.
- 6.32 **GLA and MOPAC recommendation:** No change. Victims/survivors are likely to access a wide range of types of accommodation, including privately rented accommodation, when they move on from crisis accommodation. In planning moves (in line with proposal 8.1), domestic abuse pathway referral coordinators may well work with their local authority's housing options services to secure such accommodation. However, London's strategy does not cover such accommodation because its scope is safe accommodation and the support provided there - in line with the duties conferred in the GLA by Part 4 of the 2021 Act.

Theme 2: Communication and cooperation between local authorities is vital

- 6.33 **Views expressed by consultation respondents:** Some respondents commented on the importance of communication between local authorities when planning moves, securing spaces in suitable safe accommodation for those who need them, and ensuring that victims'/survivors' support is not disrupted. One noted that reciprocal arrangements between local authorities can be helpful in providing access to move-on accommodation.
- 6.34 **GLA and MOPAC recommendation:** *Change. Communication between local authorities is vital, both for victims'/survivors' access to move-on accommodation and ensuring they receive ongoing support. Therefore, the final version of the strategy should task the Partnership Board with work on improving communication between home and host boroughs.*

Theme 3: Sanctuary schemes can play a valuable part in move-on

- 6.35 **Views expressed by consultation respondents:** Some respondents noted that sanctuary schemes are potentially useful at several stages of victims'/survivors' journeys, including move-on. They noted that these can either enable victims/survivors to return from crisis accommodation to the home they fled, where

this is a safe option, or reduce levels of risk in move-on accommodation to which victims/survivors relocate.

- 6.36 **GLA and MOPAC recommendation:** Clarify. An addition to the strategy acknowledging the potential benefits of sanctuary schemes at different stages of victims'/survivors' journeys would be helpful.

Additional comments from the Partnership Board and workshop participants

- 6.37 **Views expressed by workshop participants:** Two local authorities who attended the workshop mentioned at paragraph 2.8 commented that further clarity is needed on whether TA constitutes a potential move-on/second stage option, including when it has a sanctuary scheme.
- 6.38 **GLA and MOPAC recommendation:** No change. Victims/survivors are likely to access a wide range of types of accommodation, including accommodation secured by local authorities as TA, when they move on from crisis accommodation. Accommodation provided in this way would not be considered safe accommodation unless it meets the definition of such accommodation provided in the statutory guidance that accompanies Part 4 of the 2021 Act.

7 Policy 9 – Improving the quality of safe accommodation

Overview of comments

- 7.1 The consultation response form asked respondents to comment on the chapter of the strategy on improving the quality of safe accommodation, including specific proposals within it. Twenty-six respondents – 79 per cent of the total – commented on this chapter. Of these, two were individuals and 24 organisations. A full break down of responses by respondent type is available at Appendix 3.

Proposal 9.1: Quality standards for safe accommodation

- 7.2 In full, policy 9.1 is, 'Safe accommodation should meet high-quality standards, for both support services and accommodation, including those produced by Imkaan/Women's Aid and set out in government guidance on Part 4 of the 2021 Act.'
- 7.3 **Number and profile of respondents:** Seventeen respondents – 63 per cent of the total and 52 per cent of those who commented on the chapter on improving the quality of safe accommodation – commented on this proposal. One of these was an individual and 16 were organisations.

Recurring themes in comments on proposal 9.1

Theme 1: The proposal is welcome, as accommodation can be unsuitable for victims/survivors

- 7.4 **Views expressed by consultation respondents:** Several respondents highlighted the importance of the quality of safe accommodation, especially in relation to specifying and monitoring standards, and the suitability, security and safety of accommodation. They flagged research (from Women's Aid) that demonstrated that many refuge services are provided within buildings not fit for purpose, particularly in relation to the needs of disabled service users.
- 7.5 **Views expressed by workshop participants and/or the Partnership Board:** One local authority who attended the workshop mentioned at paragraph 2.8 noted that refuge services are often provided in very old buildings that are not fit for

purpose and in which it is difficult to deliver psychologically and/or trauma-informed provision.

Theme 2: The proposal should be more specific about the standards required and include requirements of providers

- 7.6 **Views expressed by consultation respondents:** Some respondents suggested the proposal should be clearer on the standards that safe accommodation should meet, with one commenting that the proposal seems to suggest meeting the Women's Aid/Imkaan standards is optional. One respondent recommended the strategy set out minimum standards that safe accommodation should meet. Respondents also raised concerns about non-specialist, often unregistered and/or non-commissioned providers, which research shows may abuse the benefits system's provisions for exempt accommodation. They recommend such providers should not be permitted to provide safe accommodation within the scope of Part 4 in London.
- 7.7 **GLA and MOPAC recommendation:** No change. It is difficult to specify a single quality standard that could apply to the diverse range of services within the scope of the Part 4 duty – hence citing the Imkaan/Women's Aid standards as exemplars. However, the commissioning approach through which many of the proposals in this plan will be implemented will take a robust approach to the quality of services. In particular, it will ensure that only reputable providers committed to standards appropriate to the type of service for which they seek funding are funded.

Theme 3: The proposal should provide additional detail on quality assurance.

- 7.8 **Views expressed by consultation respondents:** Concern about quality assurance was a key recurring theme in comments, particularly in relation to the process for assessing whether quality standards are being met and who will be responsible for this. One respondent noted that this assessment will need to be ongoing. One respondent proposed that the Partnership Board should be responsible for developing processes and structures to ensure consistent standards and quality of provision for accommodation. Respondents also suggested that there should be clear reporting, for when standards for accommodation and support are not met.
- 7.9 **GLA and MOPAC recommendation:** No change. The commissioning approach through which many of the proposals in this plan will be implemented will take a robust approach to the quality of services. It will also include ongoing monitoring of services funded. Moreover, monitoring and evaluating the effectiveness of London's strategy is a key aspect of the new duties conferred on the Mayor by Part 4 of the 2021 Act.

Theme 4: Quality standards should take account of specific considerations

7.10 Views expressed by consultation respondents: Respondents made various specific suggestions of factors that any quality standards should take into account, as follows:

- a) Some respondents highlighted the importance of security and physical safety as an aspect of the quality of accommodation. In relation to new build and refurbished safe accommodation, they recommended this include making physical security and fire safety measures standard.
- b) Some respondents also suggested that quality standards should include meeting victims'/survivors' diverse needs, including as the needs of victims/survivors in London may change over time. One noted that, for victims/survivors with complex needs, quality support, dedicated to ensuring victims'/survivors' safety, should include regular assessments of the risks that victims/survivors might present to themselves or others.
- c) Some respondents commented that quality services should be gender-informed and single-sex.
- d) One respondent commented that quality standards should complement requirements around the suitability of accommodation provided by local authorities under the homelessness legislation.
- e) One respondent suggested that quality standards should take account of service standards for support services produced by the Male Domestic Abuse Network.

7.11 GLA and MOPAC recommendation:

- a) Change. In the final version of the strategy, a proposal should be added to policy 9 stating that physical security should be ensured, with newly built or refurbished safe accommodation meeting Secured by Design requirements, and surveys by the Metropolitan Police's Designing Out Crime Officers undertaken where appropriate.
- b) No change. This strategy and the commissioning approach that accompanies it are driven by meeting the diverse needs of victims/survivors, in line with a needs assessment that will be regularly refreshed. On the specific issue of risk assessment, the commissioning approach will ensure that all services funded make provision for the safety of victims/survivors they support.
- c) No change. Objective 2.2 makes clear that the support provided under the remit of the strategy should be gender-informed.
- d-e) No change. See paragraph 7.7 above.

Proposal 9.2: Support and training for people working in domestic abuse services

- 7.12 In full, policy 9.2 is, 'There should be a consistent, high level of support, training and access to recognised qualifications for people working in domestic abuse services. In addition, all staff should be able to access independent and high-quality wellbeing support, which should be gender and race-informed.'
- 7.13 **Number and profile of respondents:** Ten respondents – 30 per cent of the total and 38 per cent of those who commented on the chapter on the quality of safe accommodation – commented on this proposal. Of these, two were individuals and eight were organisations.

Recurring themes in comments on proposal 9.2

Theme 1: This proposal is welcome

- 7.14 **Views expressed by consultation respondents:** Respondents broadly welcomed this proposal, commenting that support and training is important in equipping staff for roles that are challenging and traumatic.

Theme 2: Providing support and training to staff can be challenging

- 7.15 **Views expressed by consultation respondents:** Some respondents noted factors that can make it difficult to deliver consistent support and training to staff. The factors they noted were as follows:
- pressures on budgets
 - shorter-term funding, which means it can be difficult for staff to complete training or accreditation that takes several months
- 7.16 **GLA and MOPAC recommendation:** No change. The funding available to implement the duties created by Part 4 will help cover the costs of training and support. In relation to short-term services, the Mayor has impressed upon the government the need for longer-term funding for Part 4 duties.

Theme 3: Training is also needed for staff in local authority housing and homelessness services

- 7.17 **Views expressed by consultation respondents:** A couple of respondents commented that training for staff in local authority housing and homelessness services would also be valuable.
- 7.18 **GLA and MOPAC recommendation:** No change. Proposal 6.1, which relates to DAHA accreditation, has now been extended to all local authorities, regardless of

whether they own and manage social housing stock. (See paragraph 4.5 for details of this change.) This will improve understanding of domestic abuse among staff in local authority housing and homelessness services.

Proposal 9.3: Improving the quality of the fabric of crisis accommodation

7.19 In full, policy 9.3 is, 'The quality of the fabric of existing refuges and other safe crisis accommodation should be improved.'

7.20 **Number and profile of respondents:** Nine respondents – 27 per cent of the total and 35 per cent of those who commented on the chapter on the quality of safe accommodation – commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 9.3

Theme 1: Improvements should address specific aspects of building quality

7.21 **Views expressed by consultation respondents:** Some respondents noted aspects of building quality that they consider should be addressed in the course of improvements. These included the physical security and fire safety of buildings and their accessibility to users with physical disabilities.

7.22 **GLA and MOPAC recommendation:** Change. There are existing standards for building quality, set out in legislation and regulations, the London Plan and, for accommodation funded through the funding guidance for the Mayor's capital programmes, funding guidance. However, to help ensure the accessibility of safe accommodation to disabled victims/survivors, in the final version of the strategy, a proposal should be added to policy 9 to specify that the design of safe accommodation, including refuges and other crisis accommodation, second-stage and move-on, should meet their needs.

Theme 2: Provision for quality assurance of improvements is needed

7.23 **Views expressed by consultation respondents:** A couple of respondents raised the question of who will monitor the quality of improvements, inspecting them to ensure that they meet specified standards.

7.24 **GLA and MOPAC recommendation:** No change. Where appropriate, improvements will be subject to Building Control regulations. The Mayor's Affordable Homes Programmes also take a robust approach to the quality of improvements funded through those programmes.

Proposal 9.4: Mayoral funding improving the quality of safe accommodation

- 7.25 In full, policy 9.4 is, 'The Mayor will provide funding to improve the quality of safe accommodation.'
- 7.26 **Number and profile of respondents:** Nine respondents – 27 per cent of the total and 35 per cent of those who commented on the chapter on the quality of safe accommodation – commented on this proposal. All of these were organisations.

Recurring themes in comments on proposal 9.4

Theme 1: Further detail is needed

- 7.27 **Views expressed by consultation respondents:** A number of respondents raised questions about the funding, including the amount available and when and how it will be allocated. Two respondents requested clarification of whether existing safe accommodation would be eligible for funding to improve quality. One noted that it should be available for premises that do not yet meet specified standards, but that require this funding in order to do so. Another respondent wanted clarification of whether this funding could also be used to cover the costs of staff support and training, noting the need for funding for this purpose.
- 7.28 **GLA and MOPAC recommendation:** No change. This information is/will be provided as part of the commissioning approach through which many of the proposals in this strategy will be implemented and in the funding guidance for the Mayor's capital programmes.

Theme 2: New build and refurbished accommodation should meet Secured by Design standards

- 7.29 **Views expressed by consultation respondents:** A couple of respondents recommended that new-build or refurbished safe accommodation should meet Secured by Design requirements.
- 7.30 **GLA and MOPAC recommendation:** Change. A new proposal should specify that 'Physical security should be ensured, with newly built or refurbished safe accommodation meeting Secured by Design requirements and surveys by the Metropolitan Police's Designing Out Crime Officers undertaken where appropriate.'

Additional comments from the Partnership Board

- 7.31 **Views expressed by the Partnership Board:** Some members of the Partnership Board noted that there needs to be a close link between funding for support

services and capital funding to develop and improve buildings, given the inter-dependence of accommodation and support provision. One member of the Partnership Board highlighted the need for funding to improve the quality of provision. This Board member also noted that organisations that are not registered providers cannot apply for funds to renovate their properties or to provide services for women with multiple disadvantage among other services. In view of this, they expressed concerns about potential loss of provision.

- 7.32 **GLA and MOPAC recommendation:** Change. A new section and proposals to enable the buildings accommodating services to be maintained and improved should be added: 'Registered providers should work with service providers to ensure that buildings accommodating existing services are fit for purpose and, where appropriate, are refurbished or remodelled to meet the needs of victims/survivors. They should also support service providers to develop new services by partnering with them to deliver new buildings.'

Other views expressed in comments on improving the quality of safe accommodation

- 7.33 **Number and profile of respondents:** Ten respondents – 30 per cent of the total and 38 per cent of those who commented on this policy area – made a comment or comments not specific to one of the proposals. All respondents were organisations.

Recurring themes in other comments on the quality of accommodation

Theme 1: Short-term funding makes it difficult to recruit good staff

- 7.34 **Views expressed by consultation respondents:** Some service providers commented that, because services are often commissioned for short periods of time, it is hard to recruit and retain skilled staff.
- 7.35 **GLA and MOPAC recommendation:** No change. The Mayor has lobbied, and continues to lobby, the government for longer-term (and sufficient) funding to enable the implementation of the Part 4 duties.

Theme 2: The National Statement of Expectations needs to be stronger

- 7.36 **Views expressed by consultation respondents:** One respondent commented that the National Statement of Expectation support supported accommodation needs to be strengthened, so that local authorities can raise concerns about non-commissioned, often unregistered providers providing refuge or other supported accommodation for victims/survivors that is of a poor physical standard and/or provides negligible support.

- 7.37 **GLA and MOPAC recommendation:** No change. Although the Mayor shares these concerns about the poor standard of supported accommodation delivered by some providers, the National Statement of Expectation is outside the scope of this strategy. Other measures within the strategy are designed to maintain, ensure and improve the quality of safe accommodation.

8 Overview of other comments

- 8.1 The consultation response form asked respondents to comment on any aspects of the strategy outside the five policy areas covered in chapters three to seven. Twenty-six respondents – 79 per cent of the total – did so. Of these, two were individuals and 24 were organisations. A full break down of responses by respondent type is available at Appendix 3.

Recurring themes in other comments

Theme 1: The strategy and Domestic Abuse Act are too narrow in scope

- 8.2 **Views expressed by consultation respondents:** The most common topic of other comments was the scope of the strategy and, explicitly in some cases, implicitly in others, the scope of the Domestic Abuse Act.
- a) Some noted that TA is not covered in the strategy, even though victims/survivors often end up there.
 - b) A number of respondents recommended that the strategy more fully reflect the Whole Housing Approach and/or the Coordinated Community Response model. Some commented that community-based services not covered in the strategy, such as IDVAs and Mobile Advocacy, are vital in supporting victims/survivors, especially survivors who may be transient because they are sleeping rough.
 - c) Some highlighted the importance to tackling domestic violence of systems and interventions not covered in the strategy. Efforts to exclude perpetrators from victims'/survivors' homes, as well as to rehabilitate them, was mentioned most frequently. Respondents also noted the role of the police and criminal justice systems in detecting domestic abuse, enforcing sanctions against perpetrators and securing prosecutions and convictions, as well as preventative education in schools.
 - d) Some respondents suggested the strategy should not be confined to Part 4 of the Domestic Abuse Act, in order to ensure a holistic approach. More recommended that the strategy clarifies the links between areas it covers and areas it does not.
- 8.3 **GLA and MOPAC recommendation:** Recommendations on these specific points are as follows:

- a) Change. 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. In the final version of the strategy, proposal 7.4 should be amended to note that he will continue to do so. Meanwhile, efforts to increase the supply and accessibility of safe accommodation should reduce the frequency with which victims/survivors are accommodated in TA when safe accommodation would better meet their needs.
- b) No change. Both the Whole Housing Approach, which underpins the strategy, and the coordinated multi-agency response mandated by the Coordinated Community Response model are essential to tackling domestic abuse and delivering support to victims/survivors. However, this strategy is required to set out how the GLA will meet the duties conferred on it by Part 4 of the 2021 Act. The Mayor's VAWG Strategy, which is currently being refreshed, is broader in scope. This strategy should be read in conjunction with the VAWG Strategy.
- c) No change. The exclusion of perpetrators from victims'/survivors' homes; the effectiveness of the police and criminal justice system in detecting, sanctioning, prosecuting and convicting them; and work to rehabilitate them are all vital to tackling domestic abuse and ensuring victims/survivors can recover in safety. However, work in these areas sits outside the scope of Part 4 of the 2021 Act. It is covered in the Mayor's VAWG Strategy, which is currently being refreshed. This strategy should be read in conjunction with that one.
- d) No change. This strategy is required to set out how the GLA will meet the duties conferred on it by Part 4 of the 2021 Act. The Mayor's VAWG Strategy, which is currently being refreshed, is broader in its remit. This strategy should be read in conjunction with the VAWG Strategy.

Theme 2: The strategy does not address existing disparities in boroughs' provision

- 8.5 **Views expressed by consultation respondents:** The second most common view related to the limitations of the strategy and Act in addressing existing disparities in provision of accommodation-based services between boroughs. They commented that boroughs with less provision might benefit more from funding available to meet Part 4 duties than those that have invested in such services. Some noted the risk that boroughs may de-commission existing services, to the detriment of London's overall provision. Some respondents suggested that the strategy do more to safeguard existing provision and ensure boroughs contribute equitably to the capital's accommodation-based support services for victims/survivors.
- 8.6 **Views expressed by the workshop participants and the Partnership Board:** Local authority representatives also raised these concerns.

- 8.7 **GLA and MOPAC recommendation:** Change. The Act's requirement that Tier 2 authorities 'co-operate with' the Tier 1 authority gives the Mayor little leverage to ensure boroughs continue to fund existing services, or to address the disparity between boroughs' investment in such services. However, in recognition of this issue, the final version of the strategy should contain an additional proposal in the chapter on overarching issues, for the Local Partnership Board '...to explore how a more equitable approach to funding safe accommodation services across London can be achieved.' Moreover, it should make clear that periodic refreshes of the London Domestic Abuse Safe Accommodation Needs Assessment will include monitoring the level of provision of safe accommodation services in London, including any decommissioning.

Theme 3: The strategy is welcome

- 8.8 **Views expressed by consultation respondents:** Respondents frequently commented that they welcomed the strategy and supported its aims. Those who did so often cited particular reasons for welcoming the strategy. The most common was that it seeks to make accommodation-based services for victims/survivors more inclusive of diverse needs. Some highlighted the benefits that thought the strategy would deliver for certain groups, including victims/survivors whose immigration status makes it difficult to access services, those subject to multiple disadvantage and men. Others noted the value of a strategic approach to provision, greater consistency in provision, and a focus on quality.

Theme 4: The effectiveness of the strategy depends on future funding

- 8.9 **Views expressed by consultation respondents:** A number of respondents commented that the impact of the strategy will be subject to sustained government funding for new duties created by Part 4. Some noted that this is especially so in view of the ambition reflected in some of the strategy's proposals – for example, improving provision for victims/survivors whose immigration status makes it difficult to access services and seeking to ensure that, in time, all safe accommodation is self-contained. Some warned that recent allocations of funding, for short periods of time with tight timeframes for securing and spending money, did not promote a strategic approach to provision. Some urged the Mayor to lobby the government for future funding settlements that recognise London's particular needs.
- 8.10 **GLA and MOPAC recommendation:** Change. The Mayor has impressed upon the government the need for adequate funding for the duties created by Part 4; for an approach to allocation that recognises London's particular needs; and for settlements of longer duration than the first new burdens allocation. He has made clear that these things are necessary if the 2021 Act is to have the transformative impact the government envisaged. He will continue to do so. It would be helpful for

the final version of the strategy to acknowledge the limitations the initial allocation of funding covering only the current financial year, to the detriment of both strategic planning and opportunities to develop and deliver new services.

Theme 5: The strategy should include, or more strongly emphasise, particular groups or forms of need

- 8.11 **Views expressed by consultation respondents:** A number of respondents identified particular groups or forms of need that they considered should be included in the strategy, or more strongly emphasised. Migrants whose immigration status creates barriers to accessing services were most commonly mentioned, with some respondents specifying that this group should be defined in broader terms than those subject to NRPF conditions. Others included victims/survivors subject to multiple disadvantage; rough sleepers; children (including those not living with their victim/survivor parent); those who identify as gender non-binary or non-conforming; transsexuals; those who are LGBTQ+; men; home-owners and private rented sector tenants; victims of modern slavery; and those receiving care under the Care Act.
- 8.12 **Views expressed by workshop participants and the Partnership Board:** One provider welcomed the direct reference in the strategy to children of victims/survivors, but recommended that strategy go further in exploring specific services for them, such as children's therapy. Another provider recommended the strategy adopt a stronger focus on "honour-based" violence and forced marriage.
- 8.13 **GLA and MOPAC recommendation:** Change.
- It is not only migrants subject to NRPF conditions who may need this support, so the final version of the strategy should specify that this and other references to those with NRPF cover non-UK nationals with no or limited recourse to public funds.
 - The final version of the strategy should more fully acknowledge the impact of domestic abuse on children in its account of domestic abuse in London. The account of support from the DLUHC's statutory guidance should also be appended to the strategy, as this makes clear that support should include specialist provision for children.
 - The final version of the strategy should recognise the role that local authority staff responsible for enforcing standards in the private rented sector have to play in identifying residents and tenants experiencing domestic abuse and signposting them to specialist support and services. By extending proposal 6.1, on DAHA accreditation, to all local authorities (see paragraph 4.5), it will help ensure that these services are better equipped to do so.

- 8.14 GLA and MOPAC officers will also relay these comments to the Partnership Board, so that it can take them into account in future needs assessment, strategy development and funding.

Theme 6: The strategy should make recognise specific forms of support needed by victims/survivors

- 8.15 **Views expressed by consultation respondents:** A number of respondents commented on the type of support that services should provide. Most frequently, they highlighted the need for support to cover mental health and substance misuse. Others noted that it should cover long-term resilience, including education and employment; financial independence, including addressing economic abuse; loss of possessions; the trauma suffered by women who have had a child or children removed from them; physical health; and legal advice. Some highlighted the importance of support being trauma-informed and of safe accommodation operating single sex spaces.
- 8.16 **GLA and MOPAC recommendation:** Change. The details of the types of support under Part 4 from the DLUHC's statutory guidance should also be appended to the strategy, as this makes clear that it should be wide-ranging and holistic.
- 8.17 No change. Objective 2.2 makes clear that the support provided under the remit of the strategy should be both trauma- and gender-informed. The commissioning approach through which many of the proposals in this strategy will be implemented will seek to ensure that support delivered by services is tailored to the needs of service users.

Theme 7: The strategy should consider the affordability of safe accommodation, especially for victims/survivors in work

- 8.18 **Views expressed by consultation respondents:** A few respondents recommended the strategy consider the affordability of refuges and other forms of supported accommodation, especially for victims/survivors who are working and so not necessarily entitled to help with their rent through the benefits system. They noted the risk that this cohort will give up work in order to sustain safe accommodation.
- 8.19 **GLA and MOPAC recommendation:** No change. This issue is not directly within the remit of this strategy, insofar as it is also relevant to other forms of supported accommodation. Housing costs in supported accommodation have seemingly been inflated by pressure on local authorities' commissioning budgets, which have resulted in providers relying more heavily on enhanced housing management changes. The additional funding available for support as part of new burdens funding for Part 4 duties may go some way to easing this pressure. GLA and MOPAC officers will also relay this concern to the Partnership Board, so it can take this into account in further needs assessment, strategy development and funding.

Theme 8: The strategy should make clearer the roles of housing associations and local authorities

- 8.20 **Views expressed by consultation respondents:** Some respondents commented that the strategy could valuably make clearer the role of housing associations in supporting victims/survivors of domestic abuse. A few also suggested that the strategy could acknowledge the work and role of local authorities more fully.
- 8.21 **GLA and MOPAC recommendation:** Change. The draft strategy emphasises the role of social housing providers in identifying victims/survivors of abuse, supporting them and assisting them to move or remain in their homes. However, the final version of the strategy could go beyond this by setting out the role of housing associations in enabling providers to deliver services by working with them to provide, refurbish and develop suitable buildings.

Other comments from workshop participants and the Partnership Board

- 8.22 One of these stakeholders raised concerns that aspects of the Whole Housing Approach do not recognise the needs of Black and minoritised women, suggesting that it should be reassessed.

Appendices

Appendix 1: Organisations that responded to the consultation, by type

Organisation type	List of respondents
Local authority	London Borough of Brent
	London Borough of Camden
	London Borough of Enfield
	Royal Borough of Greenwich
	London Borough of Hackney
	London Borough of Hammersmith and Fulham
	London Borough of Harrow
	London Borough of Hillingdon
	Royal Borough of Kensington and Chelsea and Westminster City Council
	Royal Borough of Kingston upon Thames
	London Borough of Lambeth
	London Borough of Richmond upon Thames
	London Borough of Southwark
	London Borough of Sutton
	London Borough of Tower Hamlets
	London Borough of Waltham Forest
	London Borough of Wandsworth
	London Councils
VAWG voluntary/community sector (front-line services)	Refuge
	Solace Women's Aid
	Streetlight UK
Other voluntary/community sector (front-line services)	British Red Cross – Refugee Support (London)
	St Mungo's
Other voluntary/community sector (campaign/research/representation)	Commonweal Housing
	Homeless Link
	ManKind Initiative
Housing association	Metropolitan Thames Valley Housing
	Optivo
Professional association	Police Crime Prevention Initiatives

Community Safety Partnership	Safer Merton
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Appendix 2: Organisations that participated in workshops held as part of the consultation, by type

Organisation type	List of attendees
Local authority	London Borough of Bexley
	London Borough of Brent
	London Borough of Camden
	City of London Corporation
	London Borough of Ealing
	London Borough of Enfield
	London Borough of Hackney
	London Borough of Haringey
	London Borough of Harrow
	London Borough of Havering
	London Borough of Hounslow
	Royal Borough of Kingston upon Thames
	London Borough of Lambeth
	London Borough of Merton
	London Borough of Newham
	London Borough of Redbridge
	London Borough of Richmond upon Thames
	London Borough of Sutton
	London Borough of Tower Hamlets
	London Borough of Waltham Forest
	London Borough of Wandsworth
	Westminster City Council
Other statutory agencies	London Association of Directors of Public Health
	London Councils
	London Heads of Community Safety
	London Housing Directors' Group
	London Housing Needs and Homelessness Group
	Department of Health and Social Care
	London Victims' Commissioner
	Metropolitan Police
	NHS South East London Clinical Commissioning Group
	NHS North West London Clinical Commissioning Group
	Abianda

VAWG voluntary/community sector (front-line services)	Advance Charity
	Ashiana
	Bromley and Croydon Women's Aid
	EACH Counselling and Support
	Ella's
	Galop
	Hestia
	Iranian and Kurdish Women's Rights Organisation
	Jewish Women's Aid
	Kanlungan Filipino Consortium
	Kiran Support Services
	Kurdish and Middle Eastern Women's Organisation
	Latin American Women's Aid
	Refuge
	Respect
	Sharan Project
	Sister System
	Solace Women's Aid
	Stay Safe East
VAWG voluntary/community sector (campaign/research/representation)	Standing Together
	Women's Aid
Other voluntary/community sector (front-line services)	Chinese Information and Advice Centre
	Inclusion Barnet
	Latin American Women's Rights Service
	Respond
	Safer London
	Stonewall Housing
	Victim Support
	Young Ladies' Club
Other voluntary/community sector (campaign/research/representation)	East European Resource Centre
	Homeless Link
	Women's Resource Centre
Housing association	Housing for Women
	L&Q Living
	Look Ahead
	Optivo

Appendix 3: Detailed breakdown of consultation responses by policy area and respondent type

Policy area	Respondents									
	Individuals	Organisations								Total
		Community Safety Partnership	Housing association	Local authority	Other voluntary/ community sector (campaign/ research/ representation)	Other voluntary/ community sector (front-line services)	Professional association	VAWG voluntary/ community sector (campaign/ research/ representation)	VAWG voluntary/ community sector (front-line services)	
Policy area 1: Overarching issues	1	1	1	18	2	2	0	1	1	27
Policy area 2: Improving early intervention	2	1	1	17	2	2	1	1	2	29
Policy area 3: Improving the provision of and access to safe crisis accommodation	2	1	1	18	3	2	0	1	3	31
Policy area 4: Improving the provision of and access to move-on and second-stage accommodation, and resettlement support	1	1	1	15	3	2	1	1	2	27
Policy area 5: Improving the quality of safe accommodation	2	1	1	14	2	2	1	1	1	26
Other comments	2	0	1	15	3	2	1	1	1	29

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