

**DCLG & DWP 'Funding Short-Term Supported Housing' Consultation
(October 2017 - January 2018)**



VERA BAIRD^{QC}
POLICE & CRIME COMMISSIONER

This response to the DCLG & DWP Consultation on funding short-term supported housing is submitted on behalf of:

Dame Vera Baird, QC
Northumbria Police & Crime Commissioner (PCC)
2nd floor, Victory House, Balliol Business Park, Newcastle Upon Tyne, NE12 8EW
Email: Enquiries@northumbria-pcc.gov.uk
Tel: 0191 221 9800

Summary

The Northumbria PCC welcomes the opportunity to contribute to this consultation which has the stated purpose of seeking views on the design of the Government's new housing costs model to fund emergency and short-term supporting housing in England.

This response is restricted to the section of the consultation which is relevant to refuge services, Section 3 (short-term supported accommodation).

This response sets out why the national network of refuges is unique and does not appear to fit within the proposed funding model for short-term services; the expected impact of this proposed funding model on refuges; and suggestions on how a solution for the housing costs of refuges should be developed in the future.

The Northumbria PCC's key concerns, which are reflective of the concerns of the wider domestic abuse (DA) sector, are from a policing perspective. There would be a huge impact on the policing of DA, should refuge provision be impacted, which is likely if the Government's proposals go ahead. For example:

- Police will have no alternative, safe accommodation to direct victims of DA to.
- Less refuge provision may lead to less reports of DA, as it will become known that there is nowhere for victims to go, should they report and reach out for support.
- This is the very opposite of what the Government has been pushing for. If victims have nowhere else to go they are more likely to stay with their abusive partner. This will inevitably lead to increased and perhaps escalated abuse, as well as increased cost to police and other services, when the abuse does come to the attention of authorities.
- There will be less stability for complainants to receive sustainable support when moving through the CJS, if they do not have stable housing.

The Northumbria PCC's key concerns with the proposed funding model can be summarised as follows:

1. The removal of refuges from the welfare system reduces funding certainty for providers.

DCLG & DWP 'Funding Short-Term Supported Housing' Consultation (October 2017 - January 2018)



VERA BAIRD^{QC}
POLICE & CRIME COMMISSIONER

2. The proposed ring-fence around the fund allocated to local authorities (LAs) will be for short-term supported housing as a whole, not refuges specifically. Much short-term supported housing is expensive and must be funded by LAs due to their statutory responsibility. Due to the cuts sustained by LAs recently, it is likely that priority will be given to their own budget demands, which will impact on refuge provision. This is reflected in the responses of four LAs in Northumbria (see below at Question 3(a) and (b) and 4).
3. It is proposed that the level of the new funding will be set at current demand and predictions of future demand. However it is unclear how these calculations can be made. This is especially concerning when current demand far outstrips supply and future demand is unknown and difficult to predict.
4. There is often a lack of expertise amongst LA commissioners on the nature and impact of DA. Due to the aforementioned budget pressures, commissioners may be forced to commission generic 'one-size-fits-all' services, rather than the specialist services which are crucial in the refuge sector. Categorising refuges as one form of 'short-term' supported housing accentuates this concern, for it fails to recognise refuges unique role in the response to DA.
5. Refuges are a national, not local network of services, and are therefore unsuitable for local commissioning. This is amply demonstrated by the post-code lottery that has always affected the provision of refuge spaces and which worsened considerably when the ring fence around 'Supporting People' monies was removed.
6. It is vital that there is a national refuge co-ordinating fund and a body, perhaps the Domestic Abuse Commissioner which ensure sufficient sustainable refuge accommodation.
7. The police response in tackling and preventing DA is undermined if refuge provision is damaged.

These concerns are accentuated by the fact that neither the Local Government Authority, nor four of the six local authorities in Northumbria, appear to have given regard to the issues surrounding the new funding model for refuges in their consideration of this consultation. Therefore the ring-fence that is proposed to sit around all short-term supported housing costs, is unlikely to protect either the insufficient refuge provision we currently have across the country, nor improve it.

Question 1: Do you agree with this definition?¹

The proposed definition is too generic to reflect refuge services, which are rightly considered 'specialist' services. Although refuges are considered to fall in the bracket of 'short-term supported housing', they differ from other types of short-term accommodation. Refuges have developed, not

¹ Short-term supported housing definition: "Accommodation with support, accessed following a point of crisis or as part of a transition to living independently, and provided for a period of up to two years or until transition to suitable long-term stable accommodation is found, whichever occurs first".

DCLG & DWP 'Funding Short-Term Supported Housing' Consultation (October 2017 - January 2018)



VERA BAIRD^{QC}
POLICE & CRIME COMMISSIONER

just as a response to housing needs, but as part of the response to the DA crisis, and are an integral part of this response. Refuge services are designed to meet specific needs of women and children, with expertly trained staff who are focussed on women's and children's needs and recovery, not purely providing a bed.

A summary of the Northumbria PCC's key concerns with the proposed definition, in relation to refuges are as follows:

- The definition refers to access following a 'point of crisis'. This is not reflective of the reality faced by victims/survivors of domestic abuse, who often suffer a long period of abuse pre- and post-separation, rather than one single point of crisis. The new legislation on coercive and controlling behaviour under s76 Serious Crimes Act 2015 recognises this repeated behaviour over a lengthy period; this definition does not. Defining refuges as housing accessible to women at a 'point of crisis' denies the reality of many women and children and may influence commissioning decisions negatively.
- It does not capture the risk-element to refuges for those fleeing domestic abuse. Women who seek to separate from their abuser generally face a rapid escalation in abusive behaviour which increases their risk of experiencing serious or lethal harm. Managing this risk, which can often remain in place for a sustained period of time, requires more than temporary shelter; it requires secure housing supported by knowledgeable and skilled staff who can help the victim to minimise the risk both directly and as part of a co-ordinated community response.
- This risk is reflective of abuse which is often suffered over a length period, under the control of a perpetrator, as aforementioned. The need to acknowledge this element of refuges for women fleeing domestic abuse is highlighted by the 2016 Femicide Census, which found that 69% of the 113 women killed by men in 2016 were killed by a current/former partner, and 77.4% of these were killed within the first year following separation. It is crucial that these figures are acknowledged and adequate provision is made available for all women fleeing an abusive partner.
- The definition does not reflect that refuges are not only transitional, but transformative. It would require far more specificity around the outcomes that refuges achieve - such as safety, independence, freedom - and make clear that refuges do not just house people for a short period and help them transition on again, but they change women and children's lives.
- It does not include any reference to children, although it is estimated that refuges provide support to more children than women. It is estimated that one in seven children and young people under the age of 18 have lived with domestic abuse at some point in their childhood, which can affect them in significant ways and amounts to child abuse². For this reason,

² Radford, L, Aitken, R, Miller, P, Ellis, J, Roberts, J, and Firkic, A. (2011). Meeting the needs of children living with domestic violence in London: Research report. (London: NSPCC and Refuge).

DCLG & DWP 'Funding Short-Term Supported Housing' Consultation (October 2017 - January 2018)



VERA BAIRD^{QC}
POLICE & CRIME COMMISSIONER

refuge staff are often involved in sustained, multi-agency safeguarding interventions that focus on the needs of the child, as well as the adult.

The Northumbria PCC proposes that the Government should look to define refuges separately from short-term supported housing. The Routes to Support definition of refuges, which is also utilised by Women's Aid, is a recommendable starting point, if not the definition that should be adopted. This definition reflects the concerns highlighted above:

"Offers accommodation and support which is tied to that accommodation. The address will not be publicly available. It will have a set number of places. Residents will receive a planned programme of therapeutic and practical support from staff and access peer support from other residents. This will include: access to information and advocacy; emotional support; access to specialist support workers (e.g. drugs/alcohol misuse, mental health, sexual abuse); access to recovery work; access to support for children (where needed); practical help; key work & support planning (work around support needs including e.g. parenting, finances and wellbeing); safety planning; and counselling."

Question 2: What detailed design features would help to provide the necessary assurance that costs will be met?

The proposed funding model for refuge accommodation is concerning in various ways. It does not appear to cover the majority of the concerns held by refuge providers or the broader VAWG sector:

- **Funding Certainty:** The Government states in their policy statement attached to this consultation: *'the new local funding model...will create a single funding stream to cover housing costs'*. However refuges are sustained by two forms of income, for housing costs and support costs. The recent policy statement makes no reference to how the new proposed model of housing funding will sit alongside support funding, which is also distributed by LAs. This suggests a further disjointed model of funding for refuges. After the Government removed the ring-fence on the Supporting People programme in 2009, the fund was absorbed into shrinking LA budgets and a number of refuges were forced to close, or significantly reduce their offer. Women's Aid found that in 2016/7 over one in ten domestic abuse services who responded to their survey had no LA funding at all³. A sustainable and certain source of support costs has still not been identified. As a result housing costs are at present the only certain source of income for refuges. It is estimated by Women's Aid that, on average, housing benefit provides 89% of a refuge's currently weekly housing costs and 53% of their total yearly income⁴. The new proposals strip that

³ Women's Aid Annual Survey 2017 <https://1q7dqy2unor827bqjls0c4rn-wpengine.netdna-ssl.com/wp-content/uploads/2017/11/Women-and-children-in-refuge-services.pdf>

⁴ Women's Aid Briefing on Supported Housing Reforms, November 2017. <https://1q7dqy2unor827bqjls0c4rn-wpengine.netdna-ssl.com/wp-content/uploads/2017/11/SOS-Supported-Housing-Briefing-November-2017-1.pdf>

DCLG & DWP 'Funding Short-Term Supported Housing' Consultation (October 2017 - January 2018)



VERA BAIRD^{QC}
POLICE & CRIME COMMISSIONER

remaining certainty from providers, who, under the new funding model will be forced to rely on LA commissioning for even more costs, a plan that previously resulted in disaster for refuges and strengthens the 'postcode lottery' on funding.

- **Guarantee of the ring-fence:** The new funding model echoes the previous model for support costs, which in 2003 was reallocated in a single grant for LAs to distribute. As aforementioned, the ring-fence which was put in place around this fund was removed in 2009, leading to reduced services and closures. How will the Government guarantee that there will be no repetition of this with the new ring-fence around housing costs? Within the recent policy statement the Government states its '*intention*' to retain this ring-fence long term. Intentions are not guarantees, particularly in the context of an already damaged and struggling sector which supports some of the most vulnerable people in all supported housing. The Government must give a stronger guarantee if it is to continue with this model, which the Northumbria PCC would not recommend.
- **Uncertain equations:** The policy statement states that the grant allocations made under the new funding model to each LA area will '*match the sums that would otherwise have been paid out in each local area to pay for housing costs through the welfare system*'. The Government surely is aware that the amount currently paid out for refuges is not sufficient and already varies from area to area depending on previous funding decisions as opposed to assessed need. Matching this sum provides no certainty for refuges, and certainly is not '*a model fit for now and the future*', nor does it provide '*funding certainty*', as the policy statement sets out as its objectives for the new proposals.
- **Providing refuge access for all:** In addition, the current funding arrangements continue to exclude women who work and are therefore not eligible for housing benefit, as well as women with no recourse to public funds. The Northumbria PCC asks the Government to acknowledge and commit to the fact that all women have a right to refuge if they are a victim of domestic violence. The Government commits in its most recent VAWG Strategy⁵ and supporting National Statement of Expectations, to provide specialist refuge support and ensure that '*no victim is turned away from accessing critical support services delivered by refuges*'. However, the current and proposed funding models do not support this commitment and for this reason it is proposed that the model be re-designed to ensure funding is available to support refuge places for all.
 - Linked to this point, the Northumbria PCC is concerned that the Government states that the new funding model will allow '*individuals to secure employment without putting their housing at risk (as higher supported housing rents are often perceived by residents as unaffordable when in work)*'. The PCC calls on the Government to explain how the new model will allow this, as women who are currently not eligible for housing benefit will not be funded.

⁵ Government Strategy to End Violence Against Women and Girls: 2016-2020

DCLG & DWP 'Funding Short-Term Supported Housing' Consultation (October 2017 - January 2018)



VERA BAIRD^{QC}
POLICE & CRIME COMMISSIONER

- **Non-statutory guidance:** It is proposed that the new funding model will be supported by a '*non-statutory guidance setting out...key requirements for short-term supported accommodation*'. The PCC proposes that statutory requirements are needed to provide certainty, not non-statutory guidance which lacks teeth.
- **Current/future demand:** It is proposed that under the new model, the amount of short-term supported housing grant funding will be '*set on the basis of current projections of future need (as informed by local authorities)*'. The Government is asked to shed light on how they propose to calculate this figure, as there is no established or clear model to calculate future need for refuge provision. Demand increases in accordance with population levels, mortality, fertility and migration. But also demand is affected by changes in public perception and the law, which may result in more victims/survivors coming forward. Northumbria Police are committed to ending domestic abuse and have supported several campaigns around the issue, as well as training staff to deal with domestic abuse in the best possible way. This will inevitably result in women needing to leave their house and enter refuge provision. The Government is also proposing a new Domestic Abuse Bill which will no doubt have the same effect on demand. These efforts are meaningless if there is not enough provision for those survivors who come forward. Other concerns with this proposal to calculate funding are:
 - There is currently not enough space in refuges. Women's Aid Annual Survey in 2017 found that 60% of referrals in 2016-7 were declined (and it is likely that some referrals were not made as it was known that refuges were full)⁶. In addition, on Women's Aid 'Day to Count'⁷ in 2017, 94 women and 90 children were turned away from refuges in England. These figures do not even represent all refuge providers and therefore are likely higher. Therefore, the Northumbria PCC requests that the Government provides more detail on how future need can be calculated, when present need is indeterminate, but definitely greater than current supply would suggest. 'Routes to Support' predict that there is currently a shortfall in refuge bed spaces of 1,717, if the Council of Europe⁸ recommendation that one family place in a refuge should be provided per 10,000 heads of the population, is to be met.
 - It is submitted that LAs are not best placed to give advice on refuges, for they do not fund all refuges. Some exist with no LA funding. In addition refuges work as a national network, with the majority of residents seeking refuge in a different locality to ensure safe distance from their perpetrator. Women's Aid actually advise women that they are unlikely to be accepted in a refuge in their local area, for refuges are aware of the risks of women and children living close to their perpetrator⁹.

⁶ See note 3

⁷ Ibid

⁸ Council of Europe. (2008). *Combating violence against women: minimum standards for support services*. Council of Europe: Strasbourg.

⁹ Women's Aid. <https://www.womensaid.org.uk/the-survivors-handbook/what-is-a-refuge-and-how-can-i-stay-in-one/>

DCLG & DWP 'Funding Short-Term Supported Housing' Consultation (October 2017 - January 2018)



VERA BAIRD^{QC}
POLICE & CRIME COMMISSIONER

Question 3(a): Local authorities – do you already have a Supported Housing plan (or plan for it specifically within any wider strategies)?

Question 3(b): Providers and others with an interest – does the authority(ies) you work with involve you in drawing up Supported Housing Strategic Plans?

In preparing this response the six LAs within Northumbria were asked to provide information on whether they currently already have a Supported Housing Strategic Plan, and who is involved in drawing this up.

Four LAs were able to provide information in a short time frame. None of these LAs stated that they currently have a supported housing strategy. Two LAs are working on one, and cited homeless people as their priorities. Another LA stated that have a homelessness strategy only, but they have a range of market position statements specific to each supported housing setting, including domestic abuse. A fourth LA deals with homeless people and those fleeing DA in the same department, highlighting our point that LAs often lack the DA understanding and expertise that is required to deal with refuge provision correctly (see above in the summary and below at Question 8).

Whilst one LA in Northumbria has some consideration of DA/refuges, it is extremely telling that each of these four LAs appear to focus on homelessness as a priority in short-term supported housing. This accentuates the Northumbria PCC's concerns that, should there not be statutory guidance requiring LAs to ensure enough refuge provision and/or should the ring-fence on housing costs be removed, DA refuge provision will be a low priority for local commissioners. This would see refuge provision cut or eradicated, impacting on policing and the CJS drive to support victims of DA.

Question 3(c) All - how would the Supported Housing plan fit with other plans or strategies (homelessness, domestic abuse, drugs strategies, Local Strategic Needs Assessments)?

PCC's are tasked with writing the Police and Crime Plan for police forces, and ensuring delivery. The Northumbria PCC has also written a VAWG Strategy for Northumbria. Both the Police and Crime Plan and VAWG strategy focus on preventing and tackling DA. Various projects have been launched to address DA, including the Workplace Domestic Abuse Champions scheme and Domestic Violence Advice and Support (DVSA) Cars. DVSA cars are staffed by police and trained DA specialists, who respond to reports of DA at peak times, in order to offer victims support and advice on their options. Refuge housing is one of these options, for those who wish to escape their perpetrator. The Northumbria strategies are in line with the Government's VAWG Strategy and reflective of the broader nationwide drive to end VAWG. The Northumbria PCC is concerned that efforts to tackle DA will be hampered by a new funding model for refuges which does not guarantee refuge provision for

**DCLG & DWP 'Funding Short-Term Supported Housing' Consultation
(October 2017 - January 2018)**



VERA BAIRD^{QC}
POLICE & CRIME COMMISSIONER

the future. The closure or limiting of refuge services precludes options for escaping DA and therefore the Northumbria PCC asks the Government to rethink its plans.

Question 4(a): Local authorities – do you already carry out detailed needs assessment by individual client group?

As stated at Question 3(a) and (b), the six LAs in Northumbria were asked to give some information on whether they already carry out detailed needs assessment by individual client group. Of the four LAs that were able to respond, two did not currently have detailed needs assessment but one was reviewing this (demand provision) and the other was looking at a needs assessment as part of the development of their supported housing strategy. The Adult Social Care team was said to be leading this and will be looking at gaps in the system. Another LA confirmed they have market position statements for each client group, but it is unclear whether a market position statement equates to a detailed needs assessment and consideration of provision of housing, such as refuges. The fourth LA did not respond to this question.

The above responses are concerning and the Government is asked to consider carefully the local funding model proposed, particularly the guidance given to LAs to ensure adequate provision for all short-term supported housing. This is especially pertinent to ensure funding for the lowest priority groups is guaranteed, such as refuges.

Question 4 (c): All – is the needs assessment as described in the National Statement of Expectation achievable?

The draft NSE proposes that LAs should prepare a needs assessment based on different client groups who require short-term supported housing. Within this, they must consider who will need to use the services from outside of their local area. Unless there is a nationally funded network of refuges, the Northumbria PCC questions how these figures are supposed to be calculated, particularly by LAs who do not commission all refuges available. The PCC proposes that this local funding model is unworkable and unsuitable for refuges. The draft NSE is too generic and not applicable to refuges, for the reasons set out more fully below at Question 5.

Question 5: *In two-tier local authority areas the grant will be allocated to the upper tier, to fund provision as agreed with districts in line with the Strategic Plan. Grant conditions will also require the upper tier to develop this plan in cooperation with district authorities and relevant partners. Do you agree with this approach?*

DCLG & DWP 'Funding Short-Term Supported Housing' Consultation (October 2017 - January 2018)



VERA BAIRD^{QC}
POLICE & CRIME COMMISSIONER

It is not recommended that LAs are responsible for commissioning housing costs at all, regardless of the tier. The current approach is to fund housing costs to refuges through the welfare system, on a national level. The proposed funding model will remove individual entitlement, and instead leave the provision of refuges to local areas, despite the fact that women are known to be more likely to move to a refuge out of their local area, as highlighted above. As such, refuges should work as a national network, as they have attempted to do since their initial development in the 1970's.

Passing responsibility for housing costs to LAs is concerning. Poor local commissioning practices have been observed since support costs for refuges were moved to the responsibility of LAs. This move saw the closure and reduction in capacity of many refuge services. For example Devon County Council ended grant funding to refuge services in 2014, when the Supporting People programme ring fence was removed, despite them historically providing funding for refuge support costs. This decision forced one of the two refuges in the LA to close down their refuge of 12 rooms. The other refuge was only able to remain open by fundraising their support costs through the community. Moving the other part of refuge funding (housing costs) to LA control is therefore concerning and it is predicted that there will be further funding uncertainty and potential closures/reduction in services, due to LAs being under tight budget pressures. The incentive for them to use the new grant funding to commission lower cost, generic short-term supporting housing will no doubt be greater.

The Department for Communities and Local Government has provided emergency funding since 2014 to support refuges, however this is not a long-term solution. The Government appears to have acknowledged this, in committing to review refuge funding by November 2018. Therefore, the Northumbria PCC proposes that the Government halts any plans to alter the funding model for refuges until this review has been completed and reported on.

Question 6: The draft National Statement of Expectation (see Section 4) published today sets out further detail on new oversight arrangements and the role of local authorities. We would welcome your views on the statement and suggestions for detailed guidance.

The Government proposes that the new funding model will be supported by non-statutory guidance, as well as 'expectations', set out in a NSE. There are a few concerns with the NSE as drafted:

- **Duplicate and generic expectations:** A NSE for VAWG services has already been published by the Government¹⁰, which covers refuge provision. It is unclear how an additional, generic, NSE which relates to all supported housing will assist in improving the specialist provision of refuges.

¹⁰ Government National Statement of Expectations for VAWG services. (2016).
<https://www.gov.uk/government/publications/violence-against-women-and-girls-national-statement-of-expectations>

DCLG & DWP 'Funding Short-Term Supported Housing' Consultation (October 2017 - January 2018)



VERA BAIRD^{QC}
POLICE & CRIME COMMISSIONER

- **National, not local:** As mentioned above, refuges work best as a national network, due to the fact that most women move localities when escaping their perpetrator. Therefore the NSE focus on meeting local needs is not suited to refuges.
- **Local connection:** The draft NSE puts the burden on LAs to “*work together to agree a reciprocal approach to supporting people without a local connection*”. Given the evidence that women usually leave their LA area to seek refuge, this model seems counterintuitive. It is recommended that funding works on a national level, to reflect the national network of refuges, rather than have a local funding model in which hundreds of LAs have to seek agreements with each other about provision of refuges. This model may work for other forms of short-term supported housing but the Northumbria PCC suggests that it is inappropriate for refuges.
- **Standards of housing:** The draft NSE sets out an expectation of ‘*decent*’ standards of supporting housing. Given the life-saving, transformative and specialist nature of refuges, as set out above, this standard seems a low one and should be explored further. The PCC recommends that outcomes should be monitored and the expectations on refuge providers need to be higher.
- **Lack of improvement:** The draft NSE appears to envision that there will still be areas which have no provision for some groups requiring short-term supported accommodation. In this scenario the draft NSE states that ‘*the local authority must ensure they have an agreement in place with another local authority for the provision of such housing*’. The new funding model purports to ensure ‘fair access and ‘funding certainty’. However, it would seem that a postcode lottery will still exist, and where LAs lack provision for certain client groups, there will be no requirement to correct this. This goes against the Government’s commitment that by 2020 nobody will be turned away from refuge¹¹, and the Council of Europe recommendation that there is at least one family refuge place per 10,000 heads of the population¹². This new funding model and the draft NSE therefore do not inspire hope that there will be any improvement to refuge provision.

Question 7: Do you currently have arrangements in place on providing for those with no local connection? If yes what are your arrangements?

The Northumbria PCC is aware that, even within the Northumbria area, LAs vary in their approach to accommodating and re-housing those victims of DA who need to move away from their original LA area in order to be safe. The current consultation, with its emphasis on local commissioning, does nothing to address this variation which appears to have little, if any, grounding in assessed need.

¹¹ See note 5.

¹² See note 8.



Question 8: How can we help to ensure that local authorities are able to commission both accommodation and associated support costs in a more aligned and strategic way? Do you have further suggestions to ensure this is achieved?

The PCC views this question as key. It is noted that the policy statement does not comment on how support costs, which are already grant funded by LAs, will be paid alongside housing costs, which the Government propose will also be dealt with by LAs. As aforementioned in this response, since the removal of the 'Supporting People' programme ring-fence, refuges have been impacted negatively as a result of poor commissioning practices. Some refuges have closed and some have been forced to reduce their offer. If this new funding model is to provide funding certainty and '*secure supply*', then it is recommended the Government formulate a funding model which will mitigate the impact on refuges from local commissioning practices with regard to support costs. The key issues for refuge providers in relation to LA commissioning support costs are:

- **Short-term contracts** are increasingly common. This results in uncertain futures for many refuges and staff, who have to then invest time and resources into bidding regularly for funding. These energies and resources could be better used in providing a service to those fleeing DA. This new funding model makes it likely that short-term contracts will become even more common.
- **Specialist providers** are not recognised for the invaluable and necessary contribution to the national network of refuges. This is often due to the lack of DA/VAWG expertise amongst LA staff. LAs have commonly created difficulties for refuges by seeking to lower administrative costs and achieve economies of scale across contractual areas by amalgamating several, smaller contracts into one, general contract that smaller, specialist providers are too small to bid for and which often leaves them facing closure or take-over. The new funding proposals increase the risk that the last guaranteed element of refuge funding (housing costs) will be stripped, and smaller specialist services will face closure.
- **Women with no local connection** are increasingly being turned away by some LA-funded refuges (see Question 6/7 response) and many more face difficulties when they come to be re-housed on a permanent basis. The new funding proposal does nothing to address the localism that is, intentionally or unintentionally, exacerbating these difficulties.

The Government is asked to publish more details about how LAs will commission both support and housing costs, in order to address the issues presented.

Question 9: How will you prepare for implementation in 2020, and what can the Government do to facilitate this?

DCLG & DWP 'Funding Short-Term Supported Housing' Consultation (October 2017 - January 2018)



VERA BAIRD^{QC}
POLICE & CRIME COMMISSIONER

It is recommended that the Government halt any proposals to implement the new funding model, as drafted. It is clear that the new model does not address any of the concerns of the VAWG sector, particularly those providing refuge provision. The model does not appear to meet its objectives of providing funding certainty or being people-focussed. In addition, it is recommended that the Government await the conclusion of DCLG's review into refuge provision, which will purportedly be in November 2018, before making any changes. Changing refuge funding before the results of an ongoing review into refuge provision is concluded appears counterintuitive.

Question 10: What suggestions do you have for testing and/or piloting the funding model?

As set out at question 9, the Northumbria PCC does not recommend this model for testing or piloting, as it is unworkable and unsuitable with regards to refuges. Any suitable model should be adequately piloted in specific area for a specific group, with lessons learned being implemented in the wider roll-out. However it does not appear that there is a suitable model for funding refuges at present. It is recommended that the Government await the conclusion of the DCLG review into refuge provision in November 2018 and act accordingly with all consultation responses as well as DCLG's conclusion. The Government is called upon to seek to find a suitable national model for funding refuges, which should sit outside of the more generic group of short-term supported housing facilities which this consultation addresses. Any new model should seek to address all of the concerns raised in this response and work with providers of refuges to ensure a robust framework is put in place to ensure funding certainty and supply.

Key priorities for any funding model should include:

- Formulating a suitable definition for refuges (see question 1).
- Recognition of the life-saving and transformative nature of refuges, for women and children fleeing DA.
- Recognition of the trauma that women and children face to escape their perpetrators and the support that is required in this.
- Recognition of the number of children supported through refuges and the sometimes complex and sustained safeguarding interventions that refuge staff are required to undertake or support.
- Recognition of the need for specialist services for BAME and disabled women.
- Recognition that generic short-term supported housing is not suitable for those fleeing DA.
- Certainty and stability of funding, which should be long-term to avoid energies being wasted in bidding year after year.
- A robust monitoring and accountability framework.
- Recognition of need for a national network of refuges, based on the recommended target of 1 family refuge space per 10,000 in the local population, rather than commissioning

DCLG & DWP 'Funding Short-Term Supported Housing' Consultation (October 2017 - January 2018)



VERA BAIRD^{QC}
POLICE & CRIME COMMISSIONER

based on local needs, to reflect that fact that most victim-survivors of DA move locality to escape their perpetrator and ensure their safety, and the safety of their children.

Question 11: If you have any further comments on any aspects of our proposals for short-term supported housing, please could you state them here.

The Northumbria PCC is unclear why a different model is proposed for sheltered and extra care supported housing, than that for short term accommodation. For those in sheltered and extra care housing, a 'Sheltered Rent' is proposed, to keep funding within the welfare system. We would ask the Government to explain why a similar 'refuge rent' has not been proposed, as well as an equivalent regulator to the proposed social housing regulator' for supported/extra care housing funding. It would appear that, by removing only short-term supported housing from the welfare system, the most vulnerable people are being removed. These people may then re-enter the welfare system, if they move into long term or sheltered housing. This moving in and out of the welfare system seems an inconsistent approach.

By keeping funding within the welfare system, the sheltered and extra care model does indeed meet its objectives to providing 'funding certainty', and be 'people-focussed'¹³. It is stated in the recent policy statement that the proposed short term supported housing model has these same features. The Northumbria PCC is not clear how this is the case, as this model does not make funding certain, as it will be dependent on local commissioning practices who often lack DA expertise. In addition, the model is bed-focussed, not people-focussed.

There does not appear to be any clear rationale behind the differences in funding models for sheltered/extra care housing, and short-term supported housing. The Government is asked to explain this rationale, or in the alternative, consider a model for refuge funding more in line with the proposals for sheltered and extra care housing.

¹³ DCLG & DWP. (2017). Funding Supported Housing: Policy Statement and Consultation. P21 [42].