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Cymorth i Ferched Cymru
Welsh Women's Aid

Rhoi Merched a Phlant yn Gyntaf
Putting Women & Children First

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These are the views of:	<i>Welsh Women's Aid (Third Sector) - the national charity in Wales working to end domestic abuse and all forms of violence against women.</i>

About Welsh Women's Aid

Welsh Women's Aid is the umbrella organisation in Wales that supports and provides national representation for independent third sector violence against women, domestic abuse, and sexual violence (VAWDASV) specialist services in Wales. Our membership comprises of 20 specialist support services. These services deliver lifesaving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence against children and young people, men and boys, trans and non-binary people, as part of a network of UK provision. As an umbrella organisation, our primary purpose is to prevent domestic abuse, sexual violence, and all forms of violence against women and ensure high quality services for survivors that are needs-led, gender responsive and holistic. We collaborate nationally to integrate and improve community responses and practice in Wales. We also award the Wales National Quality Service Standards (NQSS), a national accreditation framework for domestic abuse specialist services in Wales (supported by the Welsh Government) as part of a UK suite of integrated accreditation systems and frameworks. (More information on the NQSS can be found [here](#)).

Introduction

Violence against women and girls is, at its very core, a housing issue as those who flee abuse and/or violence need a safe and adequate place to live in order to process and recover from their trauma. The ongoing housing crisis is one of the main issues impacting the violence against women, domestic abuse and sexual violence sector in Wales. In our recently released State of the Sector

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2023-24 Report, we reported that 100% of specialist domestic abuse and sexual violence services surveyed told us that the housing crisis was impacting the support available to survivors of abuse and their children¹.

While we welcome the ambitious aims to create 20,000 more low-carbon social homes for rent by 2026, we are concerned that this target is neither viable nor sufficient. To that end, we will focus on two main themes within this response: whether this is sufficient to meet housing need, and how effectively this housebuilding is supporting communities in Wales.

Housing need

The lack of social housing, temporary housing and move-on accommodation continues to be a particular issue for survivors and services in Wales. Lack of housing remains to be one of the biggest barriers to fleeing abuse and, even post-separation, the lack of social housing is leaving survivors in refuge or temporary accommodation for increasing lengths of time. Refuge is only ever intended to be short-term, secure, emergency accommodation, however, refuge services in Wales have significant numbers of survivors stay in refuge for over 6 months and in some cases, over a year. Data from specialist domestic abuse and sexual violence services that comprise membership of Welsh Women's Aid shows that in the last financial year, 117 survivors in Wales stayed in refuge over 6 months, mostly due to lack of move-on accommodation². From this, it is clear that the housing stock, at present, is insufficient to cover the needs of specialist services and survivors, and this is directly impacting their ability to recover from trauma.

More broadly, we are concerned the current target is unachievable. In the first two years of the current Programme for Government, just 5,775 homes were delivered towards the target, which includes existing homes rather than just new housing stock³. Although the Social Housing Grant – the main route via which social housing development is supported – has been increased by £5 million in this year's budget, we are concerned that the ongoing economic challenges are making this target increasingly unrealistic.

Further, even if it were fulfilled, we do not believe the target is sufficient to cover housing need. The most recent data from Welsh Government shows that there have been 18,540 placements into temporary accommodation in the last 12 months⁴. Although repeat placements are common, it must be noted that many more women, particularly those who are survivors of domestic abuse and

¹ <https://welshwomensaid.org.uk/wp-content/uploads/2024/03/State-of-the-Sector-2023-24-FINAL-ENG.pdf>

² <https://welshwomensaid.org.uk/wp-content/uploads/2024/02/Edited-Annual-Membership-Report-2022-23-without-Helpline-ENG.pdf>

³ <https://www.gov.wales/affordable-housing-provision-april-2022-march-2023-html>

⁴ <https://www.gov.wales/homelessness-accommodation-provision-and-rough-sleeping-january-2024-html>

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sexual violence, experience homelessness differently. For example, many survivors sofa-surf rather than experience street homelessness or access temporary accommodation due to safety concerns and negative previous experiences which may exacerbate the trauma they have experienced. As such, it is likely that the number of people requiring accommodation far exceeds this total. Indeed, estimates show that in Cardiff, 8,634 households were registered on the Common Housing Waiting List as at 1st March 2024⁵. In Swansea, this figure was 7,286 in March 2023⁶, allegedly rising to 7,948 by March 2024⁷. In Neath Port Talbot, the largest registered social landlord, Tai Tarian, had a waiting list of 3,005 at February 2023⁸ and internal figures suggest a total of 5,313 on the housing register as at April 12th 2024. Combined, these show that the creation of 20,000 new social homes would not cover the housing need in South Wales Central alone.

We are also concerned that single, standalone targets do not represent a sufficient whole-systems approach to tackling the housing crisis. While we wait for the White Paper on ending homelessness to be published by Welsh Government, there is a notable lack of long-term strategy to increase housing or prevent homelessness and without this, we are concerned that the planning system will not have sufficient capacity to support housebuilding at the levels required. An overall strategy and long-term plan to improve the housing environment is needed, not just tackling one issue at a time.

Housing adequacy

We believe it is not just the amount of housing but also the needs of people who will be living in these homes and the adequacy of the housing provision that must be a focus of this enquiry. The right to adequate housing is recognised in international human rights law, yet the United Nations Human Rights Office of the High Commissioner noted that the right to adequate housing remains unmet, particularly for vulnerable groups of women⁹. We believe that in order for survivors to be able to recover from abuse, housing must not just be available directly at the point of need, it must also be accessible and appropriate. We have several recommendations to achieve this:

Firstly, housing must be supplied using the principles of Housing First. The Housing First model takes a unique approach, focusing on long-term, affordable accommodation which is provided as a priority, as quickly as possible, followed by further holistic support to ensure individuals can maintain their tenancies. In a recent report, Cymorth Cymru and Welsh Women's Aid evidence that women, and survivors in particular, experience homelessness differently and a notable number may

⁵ <https://cardiff.moderngov.co.uk/documents/s76974/Written%20Questions%20and%20Answers.pdf?LLL=0>

⁶ <https://www.swansea.gov.uk/article/1099/Housing-frequently-asked-questions-FOI>

⁷ <https://www.walesonline.co.uk/news/wales-news/housing-waiting-list-now-around-28781491>

⁸ <https://democracy.npt.gov.uk/documents/s94603/App.1%20Housing%20and%20Homelessness%20Plan%202024.pdf?LLL=0>

⁹ https://www.ohchr.org/sites/default/files/Documents/publications/WomenHousing_HR.PUB.11.2.pdf

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be in need of Housing First despite not experiencing street homelessness¹⁰. It is important that the principles of Housing First are used in the allocation of housing and that the experiences of these individuals are considered.

Secondly, housing must be accessible and affordable. Many survivors have faced financial abuse and many flee abuse with no finances or resources. Financial abuse is a type of coercive control that leaves survivors with little or no access to independent finances, and many survivors have no access to their own funds, have never been able to have access to their own funds, for example, to pay bills or generate credit, and leave their relationship with nothing.

Financial stability after leaving an abusive relationship can be very difficult to maintain due to abuse-related debt and limited access to work or money. Many survivors will rely on welfare benefits upon leaving which is not sufficient to cover their needs and can make accessing housing incredibly difficult. Research from Shelter Cymru found that 51% of landlords asked, or sometimes asked prospective tenants if they are receiving benefits and 37% do not or prefer not to let to people who claim benefits¹¹. As such, we believe it is vital for Welsh Government to have a longer-term plan to ensure demand does not exceed supply so as to make housing unaffordable. Increasing the housing stock is insufficient without accompanying financial support for survivors of abuse to recover and regain their independence, and sufficient access to and understanding of the need for welfare benefits. We urge Welsh Government to continue their push for 'fair rents' and to set out a plan to ensure these are genuinely affordable for all people in Wales, including survivors of abuse.

Thirdly, housing must be appropriate for survivors' needs. We believe that is important to consider not just whether there is sufficient housing, but also whether that housing truly fits the needs of everyone in Wales. Having a safe home that is an area that meets your needs and provides a sense of belonging is key to recovering from abuse and preventing adverse childhood experiences. Unfortunately, due to the lack of social housing and the lack of community planning, this is not an option for many survivors of abuse and their children. We asked members of Welsh Women's Aid's Survivor Network about their experiences of accessing social housing and several themes were raised:

- Lack of social housing meant several survivors and their families either experienced homelessness and/or were placed in hotels as a form of temporary accommodation. Many survivors reported concerns around their safety and wellbeing related to these long-term placements, and one survivor told us "the most difficult part was not knowing how long I need

¹⁰ <https://www.cymorthcymru.org.uk/wp-content/uploads/2023/12/HF-Women-report-Eng.pdf>

¹¹ https://sheltercymru.org.uk/wp-content/uploads/2022/03/Can-I-get-a-home_Report_FINAL.pdf





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to wait for my new place and that there was nothing I or anyone else could do to speed this process up” and that she was offered a tenancy “roughly a year after I first applied for council housing”. Another survivor told us she was in a hotel for nearly two years. She reported that the hotel was “in the middle of nowhere” over 40 minutes away from her children’s school, and that “it felt like we were just left there”. Several survivors told us that their experiences of homelessness after leaving an abusive relationship were used against them by social services and family courts.

- Difficulties being removed from social housing tenancies with perpetrators or removing perpetrators from these tenancies. One survivor told us that she asked her housing officer to remove the perpetrator from the tenancy agreements after imprisonment and was told this was not possible, and the perpetrator would have to write a letter asking to be removed. They had to get further legal advice in order to remove the perpetrator and in total, the process took over 5 months and was deeply retraumatising for the survivor.
- Difficulties moving between social housing when safety issues arise. For example, one survivor reported concerns around their perpetrator moving back into the local area and received no support from the housing association despite claims they would provide safety measures.
- Survivors being treated punitively due to the behaviour of perpetrators. For example, one survivor reported having to pay for criminal damage caused by the perpetrator.
- Lack of engagement opportunities. Community cohesion is critical for survivors and their children to rebuild their lives. Many survivors have to move to a new area to rebuild their lives amongst completely new networks and social housing must be built in a way that fosters community relationships and provides a sense of belonging. One survivor told us that “inexperienced workers” led to information disclosure that placed her and her children “in so much danger”. Another survivor told us that she felt “like nobody cared, nobody engaged with us to find the hardships”. It is clear that housing officers must properly engage with and understand the needs of survivors to ensure housing placements are safe and suitable for them.
- In sum, the social housing system is currently not fit to meet survivors’ needs. As well as sufficient housing stock, we need social housing allocation and management to properly take in to account survivors’ needs, which includes mandatory VAWDASV training for housing officers.

Fourthly, housing supply must take intersectionality into consideration. The Gender-Based Violence, Needs of Migrant Women Report found that women with no recourse to public funds face particular obstacles when it comes to housing, including poor-quality or inappropriate housing, for example, due to being in an area without a proper support network¹². Further, the lack of sufficient social housing driving up market rates has a disproportionate impact on certain groups of

¹² <https://senedd.wales/media/zh5helfw/cr-ld15422-e.pdf>





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survivors. For example, low pay is greater for women from Black, Asian and Minority ethnic groups¹³ and even more so for migrant survivors and those with no recourse to public funds. As such, it is crucial that social housing is genuinely affordable for all.

Conclusion

We welcome the commitment to building 20,000 new council homes by 2026 but we believe this is not sufficient to meet housing need. Welsh Government must commit to a long-term plan which is driven by evidence-based, needs-led targets for provision, including the needs of those from vulnerable groups such as survivors of VAWDASV. We also believe the provision of social housing must be underpinned by the right to adequate housing and this must be enshrined within law to make housing appropriate and accessible as well as available. We urge Welsh Government to commit to meaningful targets to achieve this.

¹³ <https://www.livingwage.org.uk/news/women-have-long-been-trapped-essential-work-pays-too-little-its-time-make-amends>

