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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 (comprising our membership of specialist services and members of the regional VAWDASV Specialist Services Providers Forums).¹ These services deliver life-saving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence, 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 provide advice, consultancy, support and training to deliver policy and service improvements across government, public, private and third sector services and in communities, for the benefit of survivors.

We also deliver direct services including, for example, the Welsh Government funded Live Fear Free Helpline and a National Training Service partnership. We are piloting the Survivors Empowering and Educating Services (SEEdS) project, which is empowering survivors of violence and abuse to

¹ Our membership of 22 third sector violence against women, domestic abuse and sexual violence specialist services in Wales, with whom we have national partnership agreements to ensure our work is coordinated and integrated includes: Aberconwy DAS, Atal y Fro, Bangor and District Women's Aid, Clwyd Alyn Housing Association (CAHA) Women's Aid, Stepping Stones, Safer Merthyr Tydfil, Carmarthen Domestic Abuse Service, Calan DVS, Cardiff Women's Aid, Cyfannol Women's Aid, Domestic Abuse Safety Unit (DASU), Gorwel (Grwp Cynefin), Montgomeryshire Family Crisis Centre, Newport Women's Aid, North Denbighshire Domestic Abuse Service, Port Talbot & Afan Women's Aid, RCT Women's Aid, Safer Wales (including Dyn Project), Swansea Women's Aid, Threshold, West Wales Domestic Abuse Service and Rape and Sexual Abuse Support Centre (RASASC) North Wales.

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collectively influence and inform improvements in public services and commissioning frameworks, and help change attitudes.

We also deliver 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: <http://www.welshwomensaid.org.uk/what-we-do/our-members/standards/>)

Welsh Women's Aid response to Welsh Government Renting Homes (Fees etc) (Wales) Act 2019

1. Welsh Women's Aid has drafted the following in response to Welsh Government's Renting Homes (Fees etc.) (Wales) Act 2019: default fees and prescribed information. Rather than specifically answer the individual questions within the consultation we have provided comment on particular points that are relevant to the issue of violence against women, including domestic abuse and sexual violence, namely; consideration that tenants who are late with their rent, should be liable to a late payment and a repairs fee for damage caused by the tenant.

2. As Welsh Government notes in the consultation document *'it is considered fair that a tenant who is late with their rent, and perhaps sometimes consistently so, should be liable to a late payment charge'*. We disagree with this and urge Welsh Government to ensure there is an exemption or clause to cover survivors of domestic abuse in cases where there is economic abuse in the context of coercive control. We are concerned survivors of abuse will be liable for a late rent charge caused by a perpetrator who is deliberately causing housing insecurity for the survivor or preventing other economic independence. For example, 63% of tenants experiencing abuse have had rent arrears against them compared to 19% of the 'general tenant population'² and so risk losing their home. This concern is compounded by the lack of space for women who want to access refuge-based support, for example Welsh Women's Aid latest State of the Sector report found 431 survivors could not be supported due to a lack of resources and capacity³. We recommend Welsh Government consider guidance for landlords who are concerned a tenant's late payments are caused by economic abuse. Welsh Women's Aid can support with this. We would also recommend consideration is given to expanding 'Ask and Act'⁴ to this cohort of social and private landlords.

3. It is widely expected that domestic abuse and other forms of violence against women are causes of homelessness and housing insecurity for women, the 'Economics of Abuse' report found 33.3% of

² Domestic Abuse and Housing and Wales, Jackson, <http://www.cih.org/resources/PDF/Wales%20Policy/Domestic%20abuse%20and%20housing%20in%20Wales%20factsheet.pdf>, page 9

³ <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/01/State-of-the-Sector-2018-Eng.pdf>

⁴ <https://www.welshwomensaid.org.uk/training/ask-act/>

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respondents had to give up their home because of the abuse⁵. **We are concerned that the state will enable this homelessness if it does not set out clearly in legislation that survivors of abuse should not be penalised and evicted because of the actions of the perpetrator.** This would also be in contradiction to Welsh Government's plans to make it easier for perpetrators to be targeted for eviction, while maintaining the tenancy for survivors, where there is a joint tenancy.

4. In terms of damage to the property, again it is imperative that consideration is given to the cause of that damage. If there are repeat requests for repairs or specific repair requests, such as damage to doors (particularly those with locks on them) landlords should be enabled to support tenants where there are concerns the damage is caused in the context of domestic abuse and coercive control. The cost of that repair shouldn't then fall to the survivor.

5. Welsh Women's Aid would urge Welsh Government to consider looking to examples of best practice from housing associations who have policies and procedures in place where perpetrating abuse is a breach of tenancy and where staff are trained in the nuances of abuse to support early identification. In Wales, the Free from Fear Partnership includes guidance and tools for housing providers to identify and appropriately respond to survivors⁶.

6. With increasing numbers of people living in the rented sector, it is imperative landlords are supported to understand the role they must play in a coordinated response to all forms of violence against women, domestic abuse and sexual violence. The Femicide Census has consistently found that the most common place for a domestic homicide to take place is the home shared with the perpetrator (32.4% in the latest report) or the victim's own home (26.6%)⁷. Being aware of the early warning signs such as rent arrears, late payments or damage could be the difference between life and death for tenants.

Thank you for the opportunity to respond to this consultation. Welsh Women's Aid would be happy to provide further information and evidence on this topic, or related matters on request.

Any comments or questions regarding our response can be directed to:

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⁵Economics of Abuse, Sarah Davidge and Lizzie Magnusson, Women's Aid Federation England, <https://www.womensaid.org.uk/wp-content/uploads/2019/03/Economics-of-Abuse-Report-2019.pdf>, page 50.

⁶ <https://www.freefromfear.wales/>

⁷ The Femicide Census, Profiles of Women Killed by Men, Dr Julia Long, Keshia Harper, Heather Harvey <https://1q7dqy2unor827bqjls0c4rn-wpengine.netdna-ssl.com/wp-content/uploads/2018/12/Femicide-Census-of-2017.pdf> page 30

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