



Welsh Women’s Aid response to Welsh Government Renting Homes (Wales) Act 2016 – Regulations relating to Supplementary Provision.

About Welsh Women’s Aid

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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>

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

We also deliver the Wales National Quality Service Standards, 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 that include sexual violence standards and BME

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service standards for Wales delivered by partner agencies. (More information on the NQSS can be found here: <http://www.welshwomensaid.org.uk/what-we-do/our-members/standards/>)

1. Welsh Women's Aid has drafted the below in response to Welsh Governments Renting Homes (Wales) Act 2016 – Regulations relating to Supplementary Provision. Rather than specifically answer the individual questions within the consultation we have provided comment on the Renting Homes (Supported Standard Contracts) (Supplementary Provisions) (Wales) Regulations and how we feel this impacts on our membership of specialist VAWDASV service providers across Wales.

2. Welsh Women's Aid agrees that there should be separate supplementary terms for supported standard contracts, recognising the unique role supported housing plays and how that differs to 'traditional' landlords. However, we would highlight that refuge based support is different again from other supported accommodation. Refuge offers essential support to women, men and children fleeing VAWDASV; it is lifesaving, crisis accommodation that allows people to leave abusive and dangerous situations quickly. Vivaly, women's refuges offer a safe, confidential, women-only space for women who have fled male violence. We are concerned that the safety of refuges may be compromised as under the new Renting Homes Act, landlords using standard occupation contractions (including the supported standard contract) will be required to register with Rent Smart Wales. We understand that some landlords, such as registered social landlords will be exempt, however other landlords, such as charities, will not be. We understand following conversations with Welsh Government that landlords will be defined as the one offering the support or the function of the landlord (rent collection etc), rather than the provider of the accommodation (such as an RSL). We are concerned this could place the confidential address of the refuge or a dispersed unit at risk. While we appreciate someone would have to know the address or the refuge provider name in order to search, we also know some perpetrators will use various means to locate a survivor. Additionally, we are concerned that a perpetrator could be employed by Rent Smart Wales and therefore have further intelligence on a provider that has registered. There may be 'ad-hoc' ways around this, such as registering with a pseudonym, but Welsh Women's Aid would call for an exemption for any supported accommodation defined as a refuge from having to register with Rent Smart Wales. We are keen to stress however, that a water tight, definition of refuge, which must be developed with Welsh Women's Aid and our members is essential here to ensure 'rogue' private landlords who want to avoid registering with Rent Smart Wales do not try and use it as a loop-hole.

4. Welsh Women's Aid is aware that under the new Act, landlords providing licences in place of standard contracts will be required to register with Rent Smart Wales, unless the licence is with a supported housing provider for the first 6 months, however, licences will have to be converted after the 6 months to a standard or supported standard contract (the point at which they must register with Rent Smart Wales). While we are pleased that refuges will be exempt from registering because of their status as support providers; due to either a lack of move-on options post refuge, because of the loss of public services which see increased pressure on refuge to support more survivors with multiple needs, or simply due to need, some survivors stay longer than 6 months. We understand services can apply for an extension to a licence after six months, but this only lasts for three months at a time and

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is offered if a provider is concerned a resident needs continued support. We are concerned that as refuge providers may need to use this because of a lack of move on options, this would be deemed as not within the parameters of the extension and denied by a local authority. Additionally, as it is decided by individual local authorities, we are concerned this could result in different outcomes for different member services depending on which local authorities their projects are based in. We are aware Welsh Government will be publishing guidance for local authorities on when an extension to a licence should be granted, we would urge Welsh Government to consider the impact on refuge providers and we are available to provide guidance on this. Additionally, we understand that after two years people must be moved to an assured shorthold tenancy, whether in supported accommodation or not. Of course Welsh Women's Aid fully supports the rights of our member's service users to have security of tenure but again makes the point refuge should be emergency short term accommodation. If survivors are still in the accommodation after this period of time this speaks to a lack of appropriate, move-on options for people fleeing violence and we would call for an urgent review of the lack of appropriate housing by Welsh Government.

5. Welsh Women's Aid is pleased that, through conversations, Welsh Government has confirmed to us that dispersed units can still be treated as supported accommodation, and that these properties don't have to be designated. This is particularly helpful for services who work with social landlords who provide the units as and when needed, rather than allocate particular units/addresses. Specialist services often use dispersed accommodation for particular cohorts of survivors who may not be able to access 'traditional' refuge spaces, for example; men, survivors with multiple and complex needs, disabled survivors who need adapted living spaces, women with older male children etc. Specialist providers may also use dispersed units as move-on or step-down accommodation for survivors once they have spent time in 'traditional' refuge. Therefore this clarity is very welcome. However, we are concerned about the decline in available social housing and are aware of concerns from some members about local authorities considering using only the PRS for dispersed units. We therefore reiterate the point above that address anonymity is still essential for dispersed units.

Following conversations with Welsh Government we have agreed to consult with our membership to further inform our response to these issues. We hope to provide initial feedback by the end of October and to facilitate further conversations and meetings with members following that.

Welsh Women's Aid would like to thank Welsh Government for the opportunity to provide feedback on this important issue. We would also be happy to provide further oral or written evidence, if required.

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

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ⁱ Our membership of 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.

The VAWDASV Specialist Services Provider Forums in each region involves the above services plus BAWSO, Hafan Cymru, New Pathways, Seren, Henna Foundation, Relate Cymru and Llamau where they are involved in delivering services locally or regionally.