

Report to Cabinet

15 December 2021

Subject:	Domestic Abuse Safe Accommodation Strategy 2021-24
Cabinet Member:	Councillor Bob Piper Cabinet Member for Community Safety
Director:	Interim Director of Borough Economy, Nicholas Austin
Key Decision:	Yes
Contact Officer:	Maryrose Lappin Domestic Abuse Team Manager maryrose_lappin@sandwell.gov.uk

1 Recommendations

- 1.1 That approval be given to adopt the Domestic Abuse Safe Accommodation Strategy 2021-2024.
- 1.2 That the Director of Borough Economy, in consultation with the Cabinet Member for Community Safety, be authorised to review and approve subsequent reviews and amendments to the Domestic Abuse Safe Accommodation Strategy except where the changes are major or involve amended legislation.

2 Reasons for Recommendations

- 2.1 The Domestic Abuse Act 2021 placed a new statutory duty for local authorities to provide specialist support for victims of domestic abuse in safe accommodation and includes a requirement for each local authority to produce a safe accommodation strategy by 5 January 2022.



- 2.2 Final [Statutory guidance](#) on the new duty for local authorities was issued by the Department of Levelling Up, Housing & Communities (DLUHC) on 1 October 2021.
- 2.3 Under the duty, local authorities are required to:
- assess the need for victims of domestic abuse and their children in safe accommodation services in their areas;
 - produce a strategy to detail how they will respond to the duty;
 - commission support to victims and children in safe accommodation
 - appoint a domestic abuse local partnership board for the purposes of providing advice to the authority about the exercise of the authority's functions;
 - report back annually to central government that they have met these obligations.
- 2.4 Sandwell Domestic Abuse Strategic Partnership (DASP) were already responsible for the development, co-ordination and delivery of the local domestic abuse strategy. DASP has been established as the new statutory board and the terms of reference have been updated to reflect the new requirements and responsibilities.
- 2.5 Linxs Consultancy were commissioned to undertake a full domestic abuse needs assessment and develop a new domestic abuse strategy for Sandwell. The first phase of this work has focussed on the production of a safe accommodation needs assessment which has informed the Safe Accommodation Strategy 2021-24 (Appendix 1), to comply with the timescales required by the new statutory duty. Work on the wider needs assessment and strategy is continuing and it is intended that the full strategy will also be presented to Cabinet in early 2022. This work is being overseen by a multi-agency task and finish group which reports to the DASP.
- 2.6 The Safe Accommodation Strategy in Appendix 1 outlines the key points and recommendations from the needs assessment and how these will be addressed. The needs assessment has incorporated a range of data from partners; stakeholders feedback and feedback from domestic abuse victims-survivors.



- 2.7 The draft safe accommodation strategy was widely consulted on across SMBC and DASP partners and was published on the council’s website on 25 October 2021 to comply with the statutory requirement to publish a draft strategy by that date. The final safe accommodation strategy is required for publication by 5 January 2022.
- 2.8 An implementation plan will be developed to underpin the delivery of the safe accommodation strategy which will be regularly monitored by DASP.
- 2.9 New Burdens Funding has been allocated to the council to support the delivery of the new safe accommodation duty and proposals for this are currently being developed.

3 How does this deliver objectives of the Corporate Plan?

	<p>Best start in life for children and young people - The draft safe accommodation strategy outlines commitments to provide specialist support to children residing in safe accommodation who have experienced domestic abuse.</p>
	<p>People live well and age well - The draft safe accommodation strategy outlines commitments to provide specialist support to victims of domestic abuse and their children residing in safe accommodation who have experienced domestic abuse.</p>
	<p>Strong resilient communities – The draft safe accommodation strategy outlines commitments to provide specialist support to vulnerable victims and their families residing in safe accommodation and help them to cope and recover from domestic abuse.</p>

4 Context and Key Issues

- 4.1 The Domestic Abuse Act 2021 included a new statutory duty on local authorities for the provision of specialist support for victims of domestic abuse in safe accommodation from April 2021. This duty requires that a safe accommodation needs assessment is undertaken which informs a safe accommodation strategy.



- 4.2 Safe accommodation is defined in the statutory guidance. This identifies that safe accommodation is classified as being refuge accommodation; specialist safe accommodation (i.e. dedicated specialist support to victims with relevant protected characteristics and/or complex needs); dispersed accommodation (safe self-contained and semi-independent accommodation); sanctuary schemes providing target hardening of properties along with specialist support and move-on and / or second stage accommodation.
- 4.3 Specialist support for victims is also defined in the statutory guidance to include:
- Advocacy support
 - Domestic abuse prevention advice
 - Specialist support for victims designed specifically for victims with relevant protected characteristics or with additional and / or complex needs
 - Children's support
 - Housing-related support
 - Advice service
 - Counselling and therapy
- This list of support is not an exhaustive list and other relevant support services can be put in place (based on victims' needs).
- 4.4 Work has been completed on the needs assessment which has informed the draft Safe Accommodation Strategy which is contained in Appendix 1. There has been wide consultation during the development of the needs assessment and strategy, which has been overseen by a multi-agency task and finish group and approved by the Domestic Abuse Strategic Partnership.
- 4.5 The safe accommodation needs assessment has identified that the existing safe accommodation system in Sandwell is highly effective. The range of accommodation types and levels of support provided by Black Country Women's Aid (BCWA) mean that survivors are routinely accepted regardless of the level of risk or complexity of presenting needs. There is also good outcome tracking for those who are declined a space in accommodation.
- 4.6 However, the needs assessment also identifies a number of issues and gaps which the safe accommodation strategy aims to address, and the following strategy themes are identified:



1. Improving the survivors' recovery journey;
2. Enhancing the ability for survivors to stay in their own home;
3. Developing a more responsive and cohesive system.

4.7 The strategy commits to address these and outlines specific commitments including the need for: children's support; psychologically-informed interventions for adults and children in safe accommodation; dedicated sanctuary provision for adults and children; and the need for resettlement and floating support for victims and children leaving refuge. It is proposed to address the additional needs identified by the needs assessment using New Burdens funding and work is underway on proposals for this.

5 Alternative Options

5.1 It is a requirement under the Domestic Abuse Act 2021 that a domestic abuse safe accommodation strategy is published by 5 January 2022. Therefore, no alternative option is identified.

6. Implications

<p>Resources:</p>	<p>The delivery of the safe accommodation strategy will be funded via Sandwell's New Burdens grant funding. This funding is intended to cover revenue expenditure relating to the functions set out in the new statutory duty on Tier 1 Local Authorities in Part 4 of the 2021 Domestic Abuse Act, relating to the provision of support to victims of domestic abuse and their children residing within safe accommodation.</p> <p>Government has indicated they will announce specific funding allocations after the 2021 autumn spending review for 2022-23 onwards. At the time of writing, these are yet to be confirmed.</p>
<p>Legal and Governance:</p>	<p>Final Statutory guidance on the new duty for local authorities was issued by the Department of Levelling Up, Housing & Communities (DLUHC) on 1 October 2021.</p>



DLUHC requires that a final domestic abuse safe accommodation strategy is published by 5 January 2022.

The guidance relates to the functions under the Part 4 of the Domestic Abuse Act 2021. This guidance states that local authorities should also ensure they meet existing statutory requirements including (but not limited to) those set out in:

- [Equality Act 2010](#)
- [Human Rights Act 1998](#)
- [Housing Act 1996](#)
- [Homelessness Act 2002](#)
- [Crime and Disorder Act 1998](#)

The guidance indicates that the Part 4 duties are separate to local authority housing duties under the Housing Act 1996 and Homelessness Act 2002 and does not place a requirement on authorities to provide domestic abuse victims with accommodation.

However, local authorities must still comply with their duties under homelessness law in line with [Chapter 8 of the Homelessness code of guidance for local authorities](#).

The guidance states that local authorities should also consider their Part 4 duties alongside the following guidance:

- [Improving access to social housing for victims of domestic abuse](#) in refuges or other types of temporary accommodations: statutory guidance on social housing allocations for local authorities in England.
- [Homelessness Code of Guidance](#)
- [Keeping Children Safe in Education](#): Statutory guidance for schools and colleges
- [Working together to safeguard children](#): A guide to inter-agency working to safeguard and promote the welfare of children
- [Violence against women and girls](#) (including men and boys): national statement of expectations



<p>Risk:</p>	<p>The recommendations from this report will mitigate the risk of specialist support to vulnerable victims of domestic abuse and their children in safe accommodation not being available during 2021-2024. It will also mitigate the risk of SMBC not fulfilling the statutory duty for local authorities outlined in the Domestic Abuse Act 2021. The risk register addresses the potential risk of poor performance by the specialist provider, which is identified as Low Risk. It also addresses the potential for inadequate resources allocated to deliver the strategy, which is identified as Amber Risk. Inadequate governance and staffing to oversee, monitor and report on the implementation of the Safe Accommodation strategy, is also addressed and identified as Low Risk.</p>
<p>Equality:</p>	<p>An Equality Impact Assessment has been completed as part of Cabinet report process which has identified no adverse impacts or issues of concern for protected groups.</p>
<p>Health and Wellbeing:</p>	<p>The safe accommodation strategy would aim:</p> <ul style="list-style-type: none"> • To increase the safety of victims and children • To improve the physical and mental health and wellbeing of victims • To improve children’s safety • To regain/retain victims’ stability, resilience and autonomy
<p>Social Value</p>	<p>The safe accommodation strategy outlines commitments to provide specialist support for victims of domestic abuse and their children in safe accommodation. It will assist in addressing the significant issue of domestic abuse. It also aims to increase and improve the safety and wellbeing of adult and child victims, enabling them to cope and recover from the impact of domestic abuse and thus generating social value.</p>

7. Appendices

Appendix 1. Final domestic abuse safe accommodation strategy 2021-2024.



8. Background Papers

Final [Statutory guidance](#) on the new duty for local authorities was issued by the Department of Levelling Up, Housing & Communities (DLUHC) on 1 October 2021.



Sandwell Domestic Abuse Safe Accommodation Strategy - 2021-2024

Final – October 2021



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Foreword

Domestic abuse is a serious issue in Sandwell. It has a devastating impact upon the victim, children, families and the wider community, regardless of race, geography or social background. It is recognised that domestic abuse has a detrimental effect on the safety, security, health and wellbeing of both adults and children. Access to safe accommodation is vital to providing an opportunity for victims of domestic abuse and their families to escape their abuser and have a chance to live a life without fear.

The Domestic Abuse Strategic Partnership (DASP) and Sandwell MBC has a pivotal role in bringing together partner organisations and agencies in a coordinated and planned way to address domestic abuse. This strategy outlines how Sandwell MBC will work with partners to meet the new statutory requirements set out by government within the Domestic Abuse Act to provide specialist support to domestic abuse victims and their children in safe accommodation. We will work to ensure that all victims/survivors are supported to remain safe in their own home if they wish, or access alternative safe accommodation and support.

Currently we are working with our partners on a wider domestic abuse needs assessment to inform a new Domestic Abuse Strategy for Sandwell, which will be published in 2022. Supported safe accommodation is part of a range of specialist support and advice services that we offer in Sandwell to enable victims, children and their families to cope and recover from domestic abuse.

Councillor Bob Piper, Cabinet Member for Community Safety, Sandwell MBC

**Nicholas Austin, Chair of Sandwell Domestic Abuse Strategic Partnership & SMBC
Interim Director of Borough Economy**



Introduction

This strategy has been compiled in response to the new statutory duty to produce a safe accommodation strategy from the Domestic Abuse Act 2021. The Act also places a duty on Sandwell Council to support survivors of domestic abuse and their children in refuges or other safe accommodation. Additional New Burdens funding has been provided by central government to cater for this new duty. Safe accommodation is classified as being refuge accommodation, specialist safe accommodation (i.e. dedicated specialist support to victims with relevant protected characteristics and/or complex needs), dispersed accommodation (safe self-contained and semi-independent accommodation), sanctuary schemes providing target hardening of properties along with specialist support and move-on and / or second stage accommodation. These safe accommodation types are also the only types of accommodation that would be covered by the New Burdens funding.

In addition to these two duties, in relation to the provision of safe accommodation for survivors of domestic abuse and producing the safe accommodation strategy, the Act also outlines the requirement for support services to include a range of services namely: advocacy, prevention, advice, specialist support for both adults and children, counselling and therapy.

An enhanced definition of domestic abuse has been outlined which relates both to coercive control and including children witnessing domestic abuse. It should be noted, however, that specialist services have long recognised coercive control and have responded to it.

Scope

This safe accommodation chapter has been produced in advance of the comprehensive domestic abuse strategy for Sandwell. This will be published in early 2022 and will incorporate this chapter within it. This schedule has been followed in order to meet the Department of Levelling Up, Housing & Communities (DLUHC) deadline for production.

This strategy, and the comprehensive domestic abuse strategy to follow, has been produced following a detailed safe accommodation needs assessment. The needs assessment process is still continuing to inform the comprehensive domestic abuse strategy.

The needs assessment, undertaken for us by Linxs Consultancy Limited, was compiled after a data collection and analysis programme (based upon the DLUHC guidance), analysis of current services and a wide-ranging consultation programme. These consultations placed at the heart receiving the testimonies of survivors of domestic abuse. We thank all those survivors who took part in this exercise acknowledging their courage and openness in providing their experiences. Representatives from a variety of organisations have also provided their views and opinions.



Data and Issue Summary

The needs assessment contains a comprehensive analysis of the material gathered. Some of the most notable findings are outlined here. These have informed the thematic areas which we will focus upon.

- The existing safe accommodation system in Sandwell is highly effective. The range of accommodation types and levels of support provided by Black Country Women's Aid (hereafter BCWA) mean that survivors are routinely accepted regardless of level of risk or complexity of presenting needs. There is also good outcome tracking for those who are declined a space in accommodation. System effectiveness has been enhanced by the appointment of a dedicated Housing IDVA (Independent Domestic Abuse Advisor) and procedural changes bringing faster resettlement. The average length of stay was 122 days in safe accommodation in 2020/21, compared with 160 days in the preceding year.
- One tangible gap where the service could be enhanced concerns children's therapy and support. For the past six years an advocate funded by Children in Need has provided support for young people in refuge and community services, working with the survivor and child in parallel as the most effective engagement model. This funding period has now expired.
- Counselling is also not currently available to safe accommodation survivors unless there is a history of sexual abuse or violence. A recent short-term uplift in early 2021 through the Ministry of Justice enabled counselling to be offered to domestic abuse survivors across the domestic abuse provider's accommodation and community services. There were 95 immediate referrals, highlighting the level of unmet need.
- The experience of clients consulted who were in out of area safe accommodation was markedly more negative than those in Sandwell. There were a number of survivors who were critical of either the lack of information or communication that they had received from Housing Solutions and indeed regional refuge staff. The time taken to achieve resettlement for out of area survivors consulted was also noticeably longer compared with those in Sandwell safe accommodation. A new systems approach to extend the immediate direct offer system to out of area presentations is yet to be fully embedded into practice.
- The commissioning perspective is that sufficient units are currently being commissioned to meet demand. This is borne out by the fact that since 2019/20 there have been less than 10 survivors per annum placed in temporary accommodation (rather than refuge) following a homeless presentation. The number of referrals declined due to no space being available in safe accommodation has also fallen significantly, with a 50% reduction when comparing 2020/21 with the previous time period.
- A first available void policy (prioritisation for local residents) has also been successful, with Sandwell residents now more likely to receive safe accommodation within the Borough. However, there has also been a surprising decline in the overall number of referrals for safe accommodation made in relation to Sandwell residents. In 2018/19, 52.0% of all referrals, and 50.0% of accepted clients came from Sandwell. By 2020/21 these figures have fallen to 33.3% and 31.3% respectively. This could be a product of the concerted levels of investment into community services (or a local consequence of the pandemic). Nevertheless, further investigation will be carried out, especially given the fact that domestic abuse homeless



presentations to the Local Authority have increased in each of the last three years (with the 2020/21 figure of 276 almost twice as high as the level recorded in 2018/19).

- The demographics for the safe accommodation referral profile show that there have only been 11 referrals made for male survivors (just 1 accepted) in the past three years for safe accommodation, and all of these cases were in 2018/19. Similarly, there have been just 5 homeless presentations from male survivors in the past three years, representing a mere 0.8% of the total number of applicants.
- Demographic information relating to sexual identity shows 2% of referrals (2.2% accepted) were from LGBT survivors.
- The needs assessment examined the ethnicity profile for both the safe accommodation referral and homeless presentations datasets. The proportion of referrals and presentations for survivors from Asian, Black, Mixed and Other White backgrounds are in excess of the respective Sandwell population profile proportions, indicating that ethnicity is not an overall barrier to accessing safe accommodation locally.
- The use of temporary accommodation for domestic abuse survivors is problematic due to the lack of wraparound support, suitability assessments and safety measures in place. Domestic abuse workers provided examples where their clients had felt intensely isolated in temporary accommodation, leading to them deciding to return to the perpetrator and representing a missed opportunity to break the domestic abuse cycle.
- As part of a Sandwell Council Housing Solutions redesign, the bulk of temporary accommodation (for non-domestic abuse presentations) is to be located in specific managed units. This should ensure there is capacity in the remaining dispersed units of stock for any domestic abuse survivors still needing short-term temporary accommodation. However, the inclusion of dedicated domestic abuse support as part of their housing plan should also be considered essential.
- There is currently no dedicated Sanctuary service. However, Sandwell Council does offer a target hardening service for domestic abuse survivors delivered by Neighbourhood Officers in conjunction with the Building Surveying Team and Neighbourhood Repairs Officers. The service is tenure neutral and can also be provided to owner-occupiers, private rented accommodation and housing association properties. Between April 2019 and June 2021 there have been 84 properties 'target hardened', with works including enhanced security to entry doors, windows and gates, repaired fencing and external lighting installation. However, the tenure neutral aspect of this service appears to be not widely known, especially outside of the Local Authority. Indeed, there were two survivors consulted who stated they had been advised by their domestic abuse support workers that they were not eligible for target hardening.
- Once a survivor leaves refuge the specialist domestic abuse provider is not commissioned to provide any continued resettlement support. This lack of an interface or continuity of care at a crucial point in a client journey was described as an issue by a number of survivors who had left, or indeed were about to leave, safe accommodation.
- There is flexibility within the safe accommodation service's commission to subsidise or offer rent-free periods for working survivors to make refuge affordable as they are not in receipt of housing benefit. Nevertheless, working survivors interviewed indicated that they had been informed by various agency representatives that they would be unable to access safe accommodation, revealing a significant procedural barrier to support.



- Respondents representing the refuge provider stated that there is a lack of collaborative working once a survivor enters safe accommodation with the statutory agencies having fulfilled their responsibilities, leaving the specialist provider responsible for all their needs moving forward.
- Other supported accommodation providers (e.g. teenage pregnancy) were consulted as part of the needs assessment. Representatives stated that they all had domestic abuse survivors to a greater or lesser extent, either historic or current. They further indicated that in many cases, domestic abuse was not recorded within the referral information, and was only discovered through later conversations between worker and client. However, the extent to which providers subsequently proactively helped survivors to obtain specialist domestic abuse support varied considerably. Indeed, current commissioning specifications for supported accommodation providers do not include mandatory domestic abuse training for staff.

Thematic Areas

Based on this analysis the following will be the three themes that we will focus our activity upon. These themes will be delivered via a range of actions and initiatives that were also contained in the needs assessment. The themes are:

4. Improving the survivors' recovery journey;
5. Enhancing the ability for survivors to stay in their own home;
6. Developing a more responsive and cohesive system.

To make a start on delivering these themes we will use the recommendations from the safe accommodation chapter of the needs assessment. These recommendations have been translated into the three themes as follows.

1. Improving the survivors' recovery journey

We will:

- Address the gap in relation to children's support in safe accommodation. New Burdens funding will be used for two posts in 2021/22 but longer-term planning will be undertaken to ensure sustainability.
- Develop an offer for a therapeutic resource or more psychologically informed services (e.g. a visiting clinical psychologist) that can be accessed in safe accommodation or through the resettlement period in a timely manner.
- Commission a dedicated domestic abuse service to support resettlement for survivors, preserving specialist support throughout the safe accommodation journey. The resettlement service could also be used to support other specific cohorts, such as teenage



parents leaving supported accommodation and survivors who have presented as homeless who have been rapidly moved to a new permanent tenancy.

- Explore further the service offer and its marketing for male victims. There is an absolute paucity of male referrals for safe accommodation and homelessness presentations for domestic abuse. The forthcoming launch of the Black Country Women's Aid 'Ask Marc' male service should improve accessibility of services and provide greater awareness of the availability of dispersed safe accommodation. This should be bolstered though a combined communications initiative between Black Country Women's Aid and Sandwell Council/Domestic Abuse Strategic Partnership.
- Develop a domestic abuse specialist service to provide wraparound support for any domestic abuse survivors in short-term temporary accommodation, bringing a continuity of care through to refuge and resettlement.

2. Enhancing the ability for survivors to stay in their own home

We will:

- Support survivors to stay in their own homes and provide enhanced security and feelings of safety for survivors moving to new properties by working towards the instigation of a full Sanctuary scheme. The current scheme, despite being tenure neutral, does not appear to be well known outside of Local Authority departments. A Sanctuary scheme would also bring an even more holistic service for survivors than is currently in place, combining physical security with safety planning and integrated support from a specialist domestic abuse provider.
- Undertake a review, where necessary, of policies, practice and procedures relating to the rehousing of perpetrators. This will have the aim of establishing a more robust case management system to make rehousing a more viable option.

3. Developing a more responsive and cohesive system

We will:

- Use the Sandwell Council Housing Solutions redesign and training regime to foster a culture of enhanced and open conversations with survivors to remove ambiguity from the system and promote transparency concerning processes and housing outcomes. This is due to a number of survivors feeling uncertain and insecure about the bidding and direct offer processes despite the proactive Housing IDVA role.
- Introduce additional Housing staff to maximise communications with survivors and system efficiency. This will be particularly beneficial in preserving dialogue and support for survivors in out-of-area refuges.
- Continue to develop ownership by asking all agencies with a role in recovery to systematically review their processes. It is crucial for an effective recovery journey that safe accommodation becomes a 'process' for multi-disciplinary support for survivors, rather than



being seen as an end-point where other agencies' duties of care are discharged. All partners will reaffirm their commitment to developing the best outcomes for individuals.

- Raise standards and consistency of the process for accessing support and working with survivors of domestic abuse for supported accommodation providers. This will include mandating domestic abuse training within the commissioning of supported accommodation providers. This will increase staff knowledge of referral pathways and enable them to support domestic abuse disclosures more proactively.
- Use our Council's Domestic Abuse Team to co-ordinate communication work with partners to ensure there is awareness of the safe accommodation available and the nature of support offered, addressing the decline in the overall number of referrals for Sandwell residents.
- Remove the barrier preventing working survivors from entering safe accommodation. We will produce a clear position statement for all relevant agencies in Sandwell detailing how working/homeowner survivors can access safe accommodation provision.

Progress against these thematic areas and individual actions will be overseen by the Domestic Abuse Strategic Partnership along with any sub-groups or short-life groups that are formed. A detailed implementation plan outlining timescales and responsibilities for implementing these actions is also available and will be updated periodically.

New Burdens funding

Sandwell MBC has received £841,812 New Burdens funding in 2021-22 to support the implementation of the statutory domestic abuse duty. Central government has indicated its commitment to providing funding in future years to support the implementation, but at the time of publication, specific allocations are yet to be announced. New Burdens funding will be used to respond to the areas highlighted in the domestic abuse needs assessment and will be invested in:

- The provision of holistic, specialist support to adults and children living in domestic abuse refuge in Sandwell, including support for complex needs; children & family support; and provision of psychologically-informed therapeutic interventions in refuge
- Specialist community-based support to victims in safe accommodation outside refuge (including floating support & re-settlement of victims leaving refuge; support to victims in sanctuary and other safe accommodation)
- Officer and costs to support the implementation of the statutory duty and the New Burdens funding programme development and management

