

## Written evidence submitted by the Women's Budget Group

Homelessness Reduction Act 2017 – call for evidence, MHCLG  
October, 2019

The Women's Budget Group (WBG) is an independent network of leading academic researchers, policy experts and campaigners. We produce robust analysis and aim to influence the people making policy. We also work to build the knowledge and confidence of others to talk about feminist economics by offering training and creating accessible resources. The Women's Budget Group is independent and not-for-profit.

1. The Women's Budget Group welcomes the Ministry for Housing, Communities and Local Government inquiry into the Homelessness Reduction Act 2017.
2. This submission will focus on the impact of the Homeless Reduction Act 2017 on equalities, specifically on the protected characteristic of sex, focusing on the impact of the Act on women.
3. Homelessness and rough-sleeping are gendered phenomena both in whom they affect and on the different causes for and impacts on women and men.
4. Women are two-thirds (67%) of adults in households accepted as statutorily homeless.<sup>1</sup> This reflects their higher risk of losing secure housing due to lower incomes and their responsibility for caring for children.
5. Lone-parent households, 90% of which are headed by women, are overrepresented in the homeless population. They are only 7% of the population<sup>2</sup> but constitute 26% of all statutorily accepted homeless households in 2018 according to the MHCLG guidance for this consultation.
6. Among homeless households with no children, single men are over a third (36%) of all households in homelessness (11% of population) and single women are 23% of all households in homelessness (8% of population).
7. The vast majority of people sleeping rough are men (85%).
8. Women tend to be absent from sites where the night count takes place, including night shelters and soup runs. It is therefore likely that female rough-sleeping is underestimated, as women tend to be hidden, sleep in buses and trains, in A&Es or be on the move for fear of violence and abuse.<sup>3</sup>

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<sup>1</sup> WBG (2018) Housing and Gender (<http://bit.ly/2UoWROu>)

<sup>2</sup> DWP (2019) Households Below Average Income, 2017/18, Whole population (detailed breakdowns)

<sup>3</sup> St Mungo's (2017) Women and rough sleeping: a critical review (<http://bit.ly/2lrkuj6>)

9. The causes of homelessness for women are specific and vary from those for men. Domestic abuse – or ‘violent relationship breakdown’ – is very often a cause of statutorily accepted homelessness, ‘hidden homelessness’ (e.g. sofa surfing, moving in temporarily with family or friends) and rough-sleeping for women.<sup>4</sup>
10. Violent relationship breakdown is the cause of 12% of all households accepted as statutorily homeless.<sup>5</sup> This percentage is likely to be underestimated as women who are victims of domestic abuse tend to have exhausted all other options (e.g. sofa surfing, living temporarily with family and friends) before approaching their local authority for housing support.<sup>6</sup>
11. Domestic abuse is significantly linked with rough-sleeping. In a survey to their residents, St Mungo’s found that domestic abuse had contributed to the homelessness of a third of women that were sleeping rough.<sup>7</sup>

### Question 1 C – Barriers to achieve positive outcomes

12. The single main barrier for the Homeless Reduction Act to achieve its aims of ending rough-sleeping and reducing homelessness is the lack of social housing and truly affordable housing across the country.
13. The loss of an assured shorthold tenancy is now the cause of homelessness for a quarter of households,<sup>8</sup> a fourfold increase since 2010.<sup>9</sup> This is a reflection of a lightly-regulated, insecure and unaffordable private-rent sector, together with the lack of social and affordable housing.
14. Housing unaffordability is a worse problem for women due to women’s lower incomes. There is currently no region in England that is affordable to rent on women’s median annual earnings.<sup>10</sup>
15. Successive real-terms cuts to the local housing allowance rates since 2012, including setting the rates at the 30<sup>th</sup> percentile of local market rents and their freeze since 2016 means that LHA rates no longer reflect actual rents. 90% of housing benefit claimants were facing shortfalls between their benefit and due rent in 2015, with 20% facing a shortfall of more than half.<sup>11</sup>

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<sup>4</sup> MHCLG (2019) Causes of Homelessness and Rough Sleeping – Rapid Evidence Assessment (<http://bit.ly/2P1gU0c>)

<sup>5</sup> MHCLG (2018) Statutory homelessness and prevention and relief, January to March (Q1) 2018: England (Revised) (<http://bit.ly/2Db3hXF>)

<sup>6</sup> MHCLG (2019) Causes of Homelessness and Rough Sleeping – Rapid Evidence Assessment (<http://bit.ly/2P1gU0c>)

<sup>7</sup> St Mungo’s (2017) ‘New research reveals women experiencing homelessness are often hidden from help’ (<http://bit.ly/2P6FOMe>)

<sup>8</sup> MHCLG (2018) Statutory Homelessness, April to June (Q2) 2018: England (<http://bit.ly/2GgXgSM>)

<sup>9</sup> Crisis (2018) The homelessness monitor: England 2018

<sup>10</sup> WBG (2019) A home of her own – Housing and women (<http://bit.ly/2P6EwEB>) (p.4-6)

<sup>11</sup> IFS (2017) The cost of housing for low-income renters (<http://bit.ly/2uUVj0t>)

16. The subsuming of housing benefit into Universal Credit (UC) is also having a negative effect on claimants' ability to pay private-sector rents, with tenants on UC six times more likely to fall behind on rent.<sup>12</sup>
17. Another key barrier for the Act to achieve its stated aims is the lack of options for victims of violence against women (which includes domestic abuse, sexual violence, honour-based violence, forced marriage, FGM, etc).
18. Emergency accommodation, such as refuges, have suffered severe cuts in the last decade and are unable to meet demand.<sup>13</sup>
19. Due to a lack of options for permanent accommodation, a consequence of the shortage of social and affordable homes, women are spending longer periods in refuges than used to be the case. The length of stay in a refuge based in the West Midlands has increased from 11 weeks in 2014 to 48 weeks in 2018.<sup>14</sup>
20. People in different circumstances and with different needs will need specific housing options. Support with other issues such as debt, immigration status, substance misuse and trauma is crucial to ensure a sustainable re-housing process.
21. Models of accommodation with wrap-around support are in short supply.<sup>15</sup> This is a barrier to end the phenomenon of 'revolving-door homelessness' whereby individuals will successively become homeless and come into contact with their local authorities numerous times because their other issues have not been resolved.
22. For women specifically, there is a lack of single-sex emergency accommodation, supported accommodation and council-provided temporary accommodation. Given the link between women's homelessness and male-perpetrated violence, it is crucial for their well-being and progress that women-only spaces are available for homeless women and women sleeping rough.

## **Question 2 A and B – What is not working well / What should be amended**

23. The vulnerability test is currently not working to protect victims fleeing domestic abuse. The absence of statutory guidelines on how to conduct it is translated into a postcode lottery for women victims of domestic abuse, as different local authorities interpret 'vulnerability' in different ways.

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<sup>12</sup> The Independent (6 Feb 2019) 'Universal credit claimants "six times more likely" to fall into rent arrears despite government reforms' (<https://ind.pn/2YZVkhi>)

<sup>13</sup> WBG and WRC (2018) Life-Changing & Life-Saving: Funding for the women's sector (<http://bit.ly/2OQ8f2S>)

<sup>14</sup> Coventry Haven Women's Aid (2019) Presentation in 'A Home of her Own – Women and Housing in Coventry' event (27 September 2019)

<sup>15</sup> Agenda

24. In 2017, only 2% of people were found to be in priority need and made an offer of settled housing because they were vulnerable as a result of domestic abuse.<sup>16</sup>
25. Moreover, over half (53%) of survivors supported by the Women's Aid's No Woman Turned Away project, were prevented from making a valid homelessness application by their local authority.<sup>17</sup> Nearly a quarter (23.1%) of these women were prevented from making a homeless application because they were told they would not be in priority need.
26. All persons who experience domestic abuse are, by definition, vulnerable and therefore should be placed in the automatic priority need category.
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<sup>16</sup> MHCLG (2018) Live tables on homelessness. Table 773.

<sup>17</sup> Women's Aid (2018) Nowhere to turn; findings from the second year of the No Women Turned Away project. The analysis in this report is based on case work data from 264 women.