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Women's Aid Submission to the National Housing Plan 2025-2030



Women's  Aid

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Introduction

Women's Aid is a national organisation working to prevent and address the impact of domestic violence and abuse (hereafter DVA) including coercive control, in Ireland since 1974.

We do this by advocating, influencing, training, and campaigning for effective responses to reduce the scale and impact of domestic violence and abuse on women and children in Ireland and providing high quality, specialised, integrated, support services. More information on Women's Aid is available on our website www.womensaid.ie.

We welcome the opportunity to make this submission as part of the consultation for the development of a new National Housing Plan, and hope that our very specific perspective of the issues relating to homelessness and housing for the many thousands of adult and child victim-survivors of domestic abuse in Ireland will be given due consideration and weight, as an historically under recognized and represented cohort in previous Housing strategies and plans.

We understand that one of the key objectives of the new National Housing Plan (NHP) will be to increase the overall supply of housing, which is clearly essential in the current housing crisis. We believe that the plan should also address the related homelessness crisis, and given our remit we will focus this submission on how housing issues and homelessness impact on women and children survivors of DVA.

Housing issues for survivors/victims of DVA

Once a woman (often with children) leaves the family home due to an abusive relationship, re-establishing secure housing is one of the most urgent yet difficult issues she has to face. The 2021 Focus Ireland research shows that the path from leaving to secure housing is long, complex and all but straightforward, with families having to move in and out of unstable accommodation multiple times¹.

It must be noted that in most cases, prior to becoming homeless a DVA victim has lived with abuse and violence for years, this may impact on the resources she would need to exit homelessness,

such as employment and financial situation, physical and mental health, ability to call on family and social networks.

Currently victims of domestic violence and abuse face huge issues in securing accommodation both emergency and long term.

The previous Housing for All strategy was not explicitly informed by the gendered nature of homelessness as it impacts women (and often children) in different ways to men, and whereby a history - or continuing risk - of domestic and/or sexual abuse is a significant risk factor. The new strategy must explicitly consider the needs of victim-survivors of domestic abuse to ensure appropriate practical solutions and domestic abuse trauma-informed responses.

Summary of All Women's Aid Recommendations

Section	Recommendations
1	<p>1.a) The National Housing Plan should explicitly include the experiences and needs of women and children who are homeless due to domestic abuse and outline strategies and actions to address them.</p> <p>1.b) Domestic Violence services should be included on a continuous basis in any further consultation on the NHP, and also in relation to its implementation, at both local and national level.</p> <p>1.c) Women and children staying in Domestic Violence services or otherwise out of home due to domestic abuse should be included in homelessness data.</p>
2	<p>2 (a). The Housing Plan should link explicitly with the Third National Strategy on Domestic Sexual and Gender Based Violence and ensure that the fast delivery of refuge accommodation remains a priority.</p>

	2 (b). The National Housing Plan (and any new Strategy) must be explicitly domestic abuse informed, and responsive to the specific needs in particular of women and children who are at risk of homeless/homeless because of domestic abuse.
3	<p>3.a) Increase social housing as a matter of urgency and allocate a % of it to DVA victims</p> <p>3. b) Prioritise victims of Domestic Abuse in local authority allocations</p> <p>3.c) Revise the Department of Housing Guidance to: extend the definition of homeless person to people out of home due to DVA; disregard the local connection and the joint property rule for these applicants; clarify the process to transfer to sole tenancy</p> <p>3.d) Progress the social housing passport so that years on the waiting list of one LA can be carried over to another LA list.</p> <p>3.e) Ensure all Regional Statutory Homeless Action Plans are all fully DVA informed and include special considerations of responses to preventing and responding to homelessness caused by DVA.</p> <p>3.f) Ensure that there is representation in all Regional Consultative Groups of experienced specialist DVA providers operating in each region. This mechanism might be achieved efficiently and effectively in collaboration with CUAN, the National DSGBV Agency to ensure clear connections between implementation of Housing and Homeless policy and the National DSGBV Strategy.</p>
4	<p>4.a) Increase the maximum rent limit on HAP properties to realistically reflect current market rents</p> <p>4.b) Increase Homeless HAP rates to overcome the barriers faced by households moving out of homelessness.</p> <p>4.c) Ensure victims of DVA cannot be penalised if they need to break a lease for safety reasons</p> <p>4.d) Create access to a range of financial and other supports to facilitate access to immediate short, medium and longer- term safe housing eg. emergency DV rent supplement/ mortgage assistance</p>

5	<p>5.a) That the NHP includes a Homeless Prevention Strategy with a specific strand targeting victim/survivors of DVA, to ensure they do not become homeless to begin with or that the housing instability period is minimised as much as possible, where they do have to leave.</p> <p>5.b) The Homeless Prevention Strategy should include training on DVA and coercive control for homeless services.</p>
6	<p>6.a) Funding needs to be provide to ensure that new and existing refuges and transitional housing services are accessible to disabled women and children</p> <p>6.b) Accessible housing options for disabled women fleeing domestic violence must be included in the National Housing Plan</p> <p>6.c) Disabled people-led training needs to be provided to refuges, local housing authorities and social housing providers, focusing on the intersection of disability and domestic abuse and needs arising thereof.</p>
7	<p>Women's Aid endorse Focus Ireland Proposed action "to Build on the Programme for Government commitment to provide special supports for children impacted by homelessness by funding child support workers", in order to ensure that every child in homelessness should have timely access to a Child Support Worker.</p>

1. Domestic abuse and homelessness

Domestic violence and abuse (DVA) is a huge and ongoing problem in Ireland, which affects the lives of many women and children:

- 35% of women in Ireland, more than one in three, have experienced psychological, physical and/or sexual abuse from an intimate partner².
- In 2023 there were 28,638 contacts with Women's Aid, during which we heard 40,048 disclosures of abuse, including 35,570 disclosures of abuse against women and 4,478 disclosures of abuse against children. In 2023 we made 6285 referrals to refuges and local DV services and 946 referrals to housing and homeless services³.

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- In 2023 there were 28,638 contacts with Women's Aid, during which we heard 40,048 disclosures of abuse, including 35,570 disclosures of abuse against women and 4,478 disclosures of abuse against children. In 2023 we made 6285 referrals to refuges and local DV services and 946 referrals to housing and homeless services³.
- Domestic violence and abuse is a key driver of women and children's homelessness in Ireland and internationally. Moreover, a significant proportion of families accessing generic homelessness services have experienced DVA⁴.
- There is also a significant link between experiencing homelessness and having experienced domestic violence /sexual violence in childhood and/or adulthood⁵.
- Notwithstanding the ascertained above links, victims/survivors of domestic abuse are seldom included in Housing and Homelessness initiatives and strategies in Ireland; for example the current national Housing Strategy⁶ does not specifically mention survivors of domestic violence and abuse nor includes any specific actions in relation to supporting their long-term housing needs⁷. Women's Aid notes with regret that it appears to be the case that the DVA sector was not specifically targeted to invite submissions to this consultation. Women's Aid is just one of nearly 40 specialist services providing support to victims-survivors of domestic abuse, with over twenty providing specialist temporary accommodation through refuge and safe home.
- Moreover, women and children staying in Domestic Abuse refuges or with friends/family while escaping from an abuser are not counted in official homelessness data, which reinforces their invisibility in relevant housing and homelessness policies.
- Therefore, the specific housing needs of women and children who are homeless due to domestic abuse remain unknown and unaddressed.

Recommendations

- 1.a) The National Housing Plan should explicitly include the experiences and needs of women and children who are homeless due to domestic abuse and outline strategies and actions to address them.
- 1.b) Domestic Violence services should be included on a continuous basis in any further consultation on the NHP, and also in relation to its implementation, at both local and national level.
- 1.c) Women and children staying in Domestic Violence services or otherwise out of home due to domestic abuse should be included in homelessness data.

2. Immediate short-term housing issues

- In the immediate/ short term:
 - Refuges are often full as there are not enough units, which prevents women from leaving dangerous homes.⁸ While The government has committed to double refuge accommodation over the lifetime of the Third National Strategy on Domestic, Sexual and Gender-based violence⁹ **nothing** has been done so far in relation to providing **long-term** safe, secure, and affordable accommodation. In its absence women and children remain in refuges for longer than needed -which contributes to the lack of refuge spaces – and limited options for stable move on accommodation result in high risk return to the abuser, or move to unstable and inadequate premises or straight into homelessness.
 - Many refuges were not designed considering the needs of disabled women and children.
 - If the victim/survivor remains in the family home, there may be issues relating to safety as the perpetrator knows where they are and there is no national and consistent programme providing to resource enhanced safety measures.
 - Victim survivors may be forced to leave local authority accommodation where they are jointly on the lease with the abuser or flee private rented or owned property for the same reasons. Their existing tenancy, lease or mortgage contracts can become barriers to accessing safe appropriate accommodation as the reason for their departure (for safety) may not be considered by local authorities.

- Women and children may initially stay with family and friends; however, due to the housing crisis and additional factors noted above, it may take them a long time to move on from there to independent accommodation, creating 'hidden homeless' situations.

Recommendations

2 (a). The Housing Plan should link explicitly with the Third National Strategy on Domestic Sexual and Gender Based Violence and ensure that the fast delivery of refuge accommodation remains a priority.

2 (b). The National Housing Plan (and any new Strategy) must be explicitly domestic abuse informed, and responsive to the specific needs in particular of women and children who are at risk of homeless/homeless because of domestic abuse.

3. Long term housing issues.

While re-establishing safe, secure and affordable housing is an essential step to recovery from the impact of DVA for women and children, this often proves to be very difficult, especially in the current housing crisis. Even when a family has been able to access refuge, there is no clear exit path from it to long-term housing.

Issues accessing Social housing

- The lack of social housing and consequent huge waiting lists is the main barrier survivors face.
- Additionally administrative barriers and inconsistent application of guidelines prevent domestic violence and abuse victims from accessing local /social housing or being prioritised. In particular:
 - Domestic abuse is not named specifically in the factors used to assess a person as homeless under the Housing Act 1988. As a consequence, some Local Authorities do not consider women who have left their homes because of domestic abuse and are staying with friends/relatives as "homeless". Therefore, they are deemed as ineligible for priority

housing. However staying with friends or family is not an appropriate long term solution for the majority of women and children in this situation.

- Some Local Authorities require applicants to have lived in the area for a specified time or to have local connections to the area in order to be eligible for housing. This is problematic for women and children who wish to relocate to an area far away from where they were living with the abuser in order to keep safe.
- Some Local Authorities do not consider a woman entitled to social housing if she jointly owns a property with her abuser, regardless of the fact that she is not able to live there due to safety concerns.
- There is no clear guidance on how to transfer local authority tenancies from joint tenancy with the perpetrator to a sole one in case of DVA
- There is an persistently inconsistent approach to domestic abuse victim-survivors by Local Authorities which must be overcome, in such a small country.
- While Department of Housing Guidance¹⁰ states that housing authorities have discretion in allowing applications or establishing priority for victims of DV, it does not place a **positive obligation** on housing authorities to disregard the above rules in cases where there is domestic violence, which means that there is no consistency in dealing with victims/survivors.
- A survivor on a Local Authority housing list who needs to move to another LA for safety would have to start a fresh application and lose the time they have built up. While there have been suggestions of a “social housing passport”¹¹, there is no clarity on its progress.
- **Regional Statutory Homeless Action Plans** need to include specific plans to respond to the risk of and actual homelessness associated with DVA. Prevention as well as response must be included in such plans.
- There is currently no explicit requirement for inclusion of local domestic violence service providers in each of the nine **Regional Consultative Groups**, where established or in planning to establish.

Recommendations

- 3.a) Increase social housing as a matter of urgency and allocate a % of it to DVA victims
- 3. b) Prioritise victims of Domestic Abuse in local authority allocations
- 3.c) Revise the Department of Housing Guidance to: extend the definition of homeless person to people out of home due to DVA; disregard the local connection and the joint property rule for these applicants; clarify the process to transfer to sole tenancy
- 3.d) Progress the social housing passport so that years on the waiting list of one LA can be carried over to another LA list.
- 3.e) Ensure all Regional Statutory Homeless Action Plans are all fully DVA informed and include special considerations of responses to preventing and responding to homelessness caused by DVA.
- 3.f) Ensure that there is representation in all Regional Consultative Groups of experienced specialist DVA providers operating in each region. This mechanism might be achieved efficiently and effectively in collaboration with CUAN, the National DSGBV Agency to ensure clear connections between implementation of Housing and Homeless policy and the National DSGBV Strategy.

4. Issues accessing the private market

With social housing being extremely scarce, the only real option for most women who leave the family home is the private market. The housing crisis makes securing new accommodation in the private market (both buying and renting) nearly impossible for women who have suffered economic abuse, have little access to savings or the family estate and may have negative credit or rental history due to the abuser's actions.

When survivors try to access the private rental market, they face the following issues:

- The HAP payment rate is too low, with women having to top up from other sources, which they often do not have
- The rent limit on HAP properties does not reflect current market rents, and does not allow survivors to compete in the current rental market

- There is no clarity on whether a survivor already renting in the private market would be able to terminate a lease for safety reasons without penalties, or to transfer from joint to sole tenancy, leaving this to the discretion of the owner/agency.
- If a woman remains in the family home, ideally with a Barring Order, she may have difficulties in continuing to pay mortgage rates or rent with a much-reduced household income, particularly in the first few months after separation which are usually a time of great financial stress.
- Many women who leave the family home due to DVA, leave in a hurry and with very little; establishing a new home therefore also involve replacing necessary belongings and households items, for which there is no systematic assistance.
- Similarly, there is no government programme to assist survivors (whether remaining in the family home or in a new one) pay for vital safety measures (see more on this below).

Recommendations

- 4.a) Increase the maximum rent limit on HAP properties to realistically reflect current market rents
- 4.b) Increase Homeless HAP rates to overcome the barriers faced by households moving out of homelessness.
- 4.c) Ensure victims of DVA cannot be penalised if they need to break a lease for safety reasons
- 4.d) Create access to a range of financial and other supports to facilitate access to immediate short, medium and longer- term safe housing eg. emergency DV rent supplement/ mortgage assistance

5. Preventing homelessness in the context of DVA

When women and children leave their home because of DVA, the risk of long term housing insecurity and homelessness is very real. It is in fact a concern that prevents women from leaving or having left, may force them to return to the abuser¹². The impact of homelessness on children cannot be overstated, and mothers are very aware of it and find themselves facing the impossible choice between homelessness and safety. Moreover being homeless may increase the risk of further gender based violence.

As it is very difficult to re-establish secure housing once homeless, where women have a home, whether owned, privately rent or social housing, they should be provided with increased and holistic supports to stay in the family home **if they wish and are safe to do so**.

In this respect, and as a small snapshot of the need, we note that in 2023 the Women's Aid Emergency Fund has contributed 28,992 euro to rent/emergency accommodation costs and 42,472 euro for security measures for women accessing our and other DVA services¹³. This finite support, paid for by fundraising, is no substitute for an ongoing, fully funded national program.

The Australian Staying Home, Leaving Violence program¹⁴ and the UK Sanctuary Scheme¹⁵ provide examples of programs where agencies work together to make it safer for a woman and children to remain in the family home by removing the perpetrator and providing a range of supports, such as; safety planning, improving home security, assistance with legal issues and in managing finances and providing tailored support for any relevant issues as needed (such as mental health, disability, substance abuse, immigration status), that may hinder their ability to maintain housing.

Note however, that remaining in the home may not be possible or desirable in all cases, survivors need to have the option to relocate to a new home and should be assisted to do so if that is their preferred option. In this case, the same measures to increase the safety of the home and ensure its financial viability need to be applied to the new housing, as well as any relevant supports, with the aim to minimise the period of homelessness or housing instability.

Survivors of DVA should also be financially supported to be able to retain the family home with mortgage or rent assistance, especially for the initial period after separation to prevent them falling into homelessness.

Women's Aid notes that Focus Ireland in their submission recommends that the NHP should include the Development of a Homeless Prevention Strategy. We agree with this proposal but add that such strategy should also have a **specific strand looking at homeless prevention in the context of DVA**,

which should explore how to assist DVA survivors remaining safely in the home. This can include programs such as Staying Home Leaving Violence / Sanctuary Schemes to increase safety of the home and financial measures such as mortgage or rent support to increase security of tenure. It should also include measures to provide a quick path to housing stability for those women who cannot or choose not to remain in the family home.

Not all DVA victim-survivors are able to be accommodated in specialist DV services, many access generic homelessness services. All the homeless services in the Focus Ireland research confirmed that domestic violence is a constant feature of their work¹⁶. It is important that staff in these service can identify DVA and are trained on how respond and refer to specialist services. This should also be included in the DVA strand of the Homeless Prevention Strategy.

Recommendations

5.a) That the NHP includes a Homeless Prevention Strategy **with a specific strand targeting victim/survivors of DVA**, to ensure they do not become homeless to begin with or that the housing instability period is minimised as much as possible, where they do have to leave.

5.b) This Strand of the Homeless Prevention Strategy should include training on DVA and coercive control for homeless services.

6. Survivors with a disability

Women's Aid recent research shows that disabled women are more likely to experience intimate partner abuse when compared to non-disabled women and face more barriers leaving, appropriate housing being one of such barriers both in terms of emergency refuges and long term housing.¹⁷ Our research has also evidenced the need for training for local housing authorities, social housing and refuges on the intersection of disability and domestic abuse.

In addition many adult victim-survivors are also caring for children with disabilities which must be considered.

Recommendations

- 6.a) Funding needs to be provided to ensure that new and existing refuges and transitional housing services are accessible to disabled women and children
- 6.b) Accessible housing options for disabled women fleeing domestic violence must be included in the National Housing Plan
- 6.c) Disabled people-led training needs to be provided to refuges, local housing authorities and social housing providers, focusing on the intersection of disability and domestic abuse and needs arising thereof.

7. Children

Women's Aid shares Focus Ireland's concerns regarding homeless children, who face huge disruption and challenges. Children who are forced to leave the family home because of DVA face additional challenges, including not only dealing with the consequences of past abuse, but often with the ongoing abuse of themselves and/or their mother after separation.

We agree therefore that there is a need to offer support for children in this situation and endorse Focus Ireland Proposed Action "to Build on the Programme for Government commitment to provide special supports for children impacted by homelessness by funding child support workers", in order to ensure that every child in homelessness should have timely access to a Child Support Worker.

Conclusions

Women's Aid strongly recommends that the National Housing Plan clearly and in a cross cutting manner through all aspects of the Plan recognises the key role that domestic abuse plays in making women and children homeless and includes actions to meet their specific needs. We also propose that there be greater engagement with the Specialist Domestic Abuse service providers at both local and national level as a core consideration in the delivery of the plan itself. To this end, we are very

keen to participate in any further consultation on the development of the Plan and are available to discuss any aspect of this submission upon request.